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Initial Study

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Date of this Notice: December 9, 2006

Lead Agency: City and County of San Francisco, Planning Department
1660 Mission Street, Suite 500, San Francisco, CA 94103-24114

Agency Contact Person: Nannie Turrell
Telephone: (415) 558-5994

Project Title: 2004.1094E Golden Gate Park Equestrian Center
Contact Person: Mary Hobson

Project Sponsor: City and County of San Francisco, Recreation and Park Department
Telephone: (415) 581-2575

Golden Gate Park, south of John F. Kennedy Drive and
James W Bloesch Road intersection
Block 1700, Lot 001
San Francisco

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Golden Gate Park Equestrian Center project would involve the
Gate Park stables, demolition of the grandstand and ancillary
dditional stables, and expansion of the existing arena. The City and
creation and Park Department is the owner and operator of the site.
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offer horseback riding. The GGP Equestrian Center is located
ng district and OS (Open Space) Height and Bulk District. The
an identifies this site as a Major Recreational Area land use zone.

Numbers: Not yet filed.

HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT.
MPACT REPORT IS REQUIRED. This determination is based
elines of the State Secretary of Resources, Sections 15063 (Initial
ermining the Significance of the Environmental Effects Caused by a
Findings of Significance), and the following reasons, as documented
oject, which is attached.

Written comments on the scope of the EIR will be accepted until the close of business on January 8, 2007. Written comments should be sent to: Paul Maltzer, Environmental Review Officer, San Francisco Planning Department, 1660 Mission Street, Suite 500, San Francisco, CA 94103-24114.

State Agencies: We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the Proposed Project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. Thank you.

December 9, 2006
Date

Paul E. Maltzer, Environmental Review Officer

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Date of this Notice: December 9, 2006

Lead Agency: City and County of San Francisco, Planning Department
1660 Mission Street, Suite 500, San Francisco, CA 94103-24114

Agency Contact Person: Nannie Turrell	**Telephone:** (415) 558-5994
Project Title: 2004.1094E Golden Gate Park Equestrian Center	**Project Sponsor:** City and County of San Francisco, Recreation and Park Department
Contact Person: Mary Hobson	**Telephone:** (415) 581-2575

Project Address:	Golden Gate Park, south of John F. Kennedy Drive and James W Bloesch Road intersection
Assessor's Block and Lot:	Block 1700, Lot 001
City and County:	San Francisco

Project Description: The Golden Gate Park Equestrian Center project would involve the rehabilitation of the Golden Gate Park stables, demolition of the grandstand and ancillary structures, construction of additional stables, and expansion of the existing arena. The City and County of San Francisco Recreation and Park Department is the owner and operator of the site. The goal of the Proposed Project is to bring the historic activity of horseback riding back to Golden Gate Park. Before the stables were closed in 2001, Golden Gate Park was one of the last urban parks in the country to offer horseback riding. The GGP Equestrian Center is located within a P (Public Use) zoning district and OS (Open Space) Height and Bulk District. The Golden Gate Park Master Plan identifies this site as a Major Recreational Area land use zone.

Building Permit Application Numbers: Not yet filed.

THIS PROJECT COULD HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT. AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary of Resources, Sections 15063 (Initial Study), Sections 15064 (Determining the Significance of the Environmental Effects Caused by a Project), 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Initial Study for the project, which is attached.

Written comments on the scope of the EIR will be accepted until the close of business on January 8, 2007. Written comments should be sent to: Paul Maltzer, Environmental Review Officer, San Francisco Planning Department, 1660 Mission Street, Suite 500, San Francisco, CA 94103-24114.

State Agencies: We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the Proposed Project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. Thank you.

December 9 2006
Date

Paul E. Maltzer, Environmental Review Officer

INITIAL STUDY
(2004.1094E – Golden Gate Park Equestrian Center)

A. PROJECT DESCRIPTION

SUMMARY OF PROPOSED PROJECT

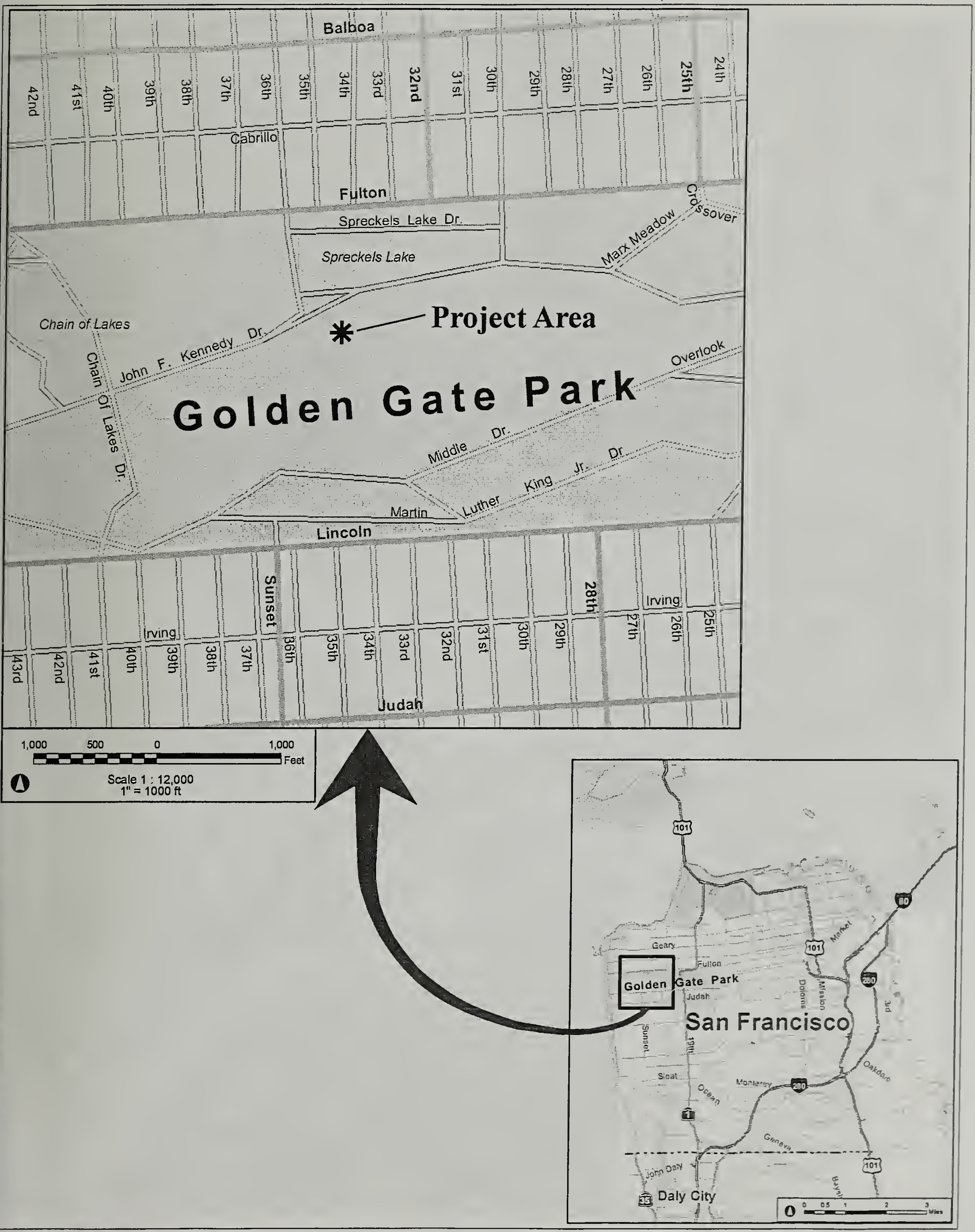
The City and County of San Francisco Recreation and Park Department is proposing the Golden Gate Park Equestrian Center project (Proposed Project). The Proposed Project includes the rehabilitation of the Golden Gate Park stables, demolition of the grandstand and ancillary structures, construction of additional stables, and expansion of the existing arena. The City and County of San Francisco Recreation and Park Department is the project sponsor, owner, and operator of the site.

BACKGROUND

The Golden Gate Park Equestrian Center (GGP Equestrian Center) consists of stables surrounding an arena, a hay barn, converted house trailer, four small structures used for tack and equipment, and a grandstand (Figure 1 – Location Map and Figure 2 – Existing Conditions). The GGP Equestrian Center was used to board horses until September 2001. The primary purpose of the GGP Equestrian Center was to provide lessons in riding and horsemanship to the general public. This facility was operated by Golden Gate Park Stables, Inc. until 2001, when it closed its business operations. The City and County of San Francisco Recreation and Park Department (Department) made the decision at that time to temporarily close the stables to investigate the repairs needed at the facility. The Golden Gate Park Stables Working Group (Group) was formed after the stables closed to assist the Department in planning for the Center's renovation. The Group assessed the conditions of the facility and recommended physical changes and improvements for future use.

The architectural firm of Carey & Co., Inc. was contracted through the City to prepare a historic resource evaluation of the structures at the GGP Equestrian Center. Carey & Co. concluded that the stables, built during the Works Progress Administration (WPA), were historically significant and structurally sound, and should be preserved. The stalls underneath the grandstand were not built as part of the WPA project. The dilapidated condition of the grandstand was found to be so severe that Carey & Co. concluded that successful restoration of the structure is unlikely.

The grandstand was built in 1909 and was intended to provide seating in conjunction with other planned stadium bleachers to seat 100,000 people around the polo field (also referred to as the GGP Stadium). The GGP Stadium was constructed in 1907. However, the plan to complete the stadium as part of the Proposed 1915 Panama-Pacific International Exposition was abandoned



Source: StreetMapUSA / EDAW 2006

Figure 1
Location Map

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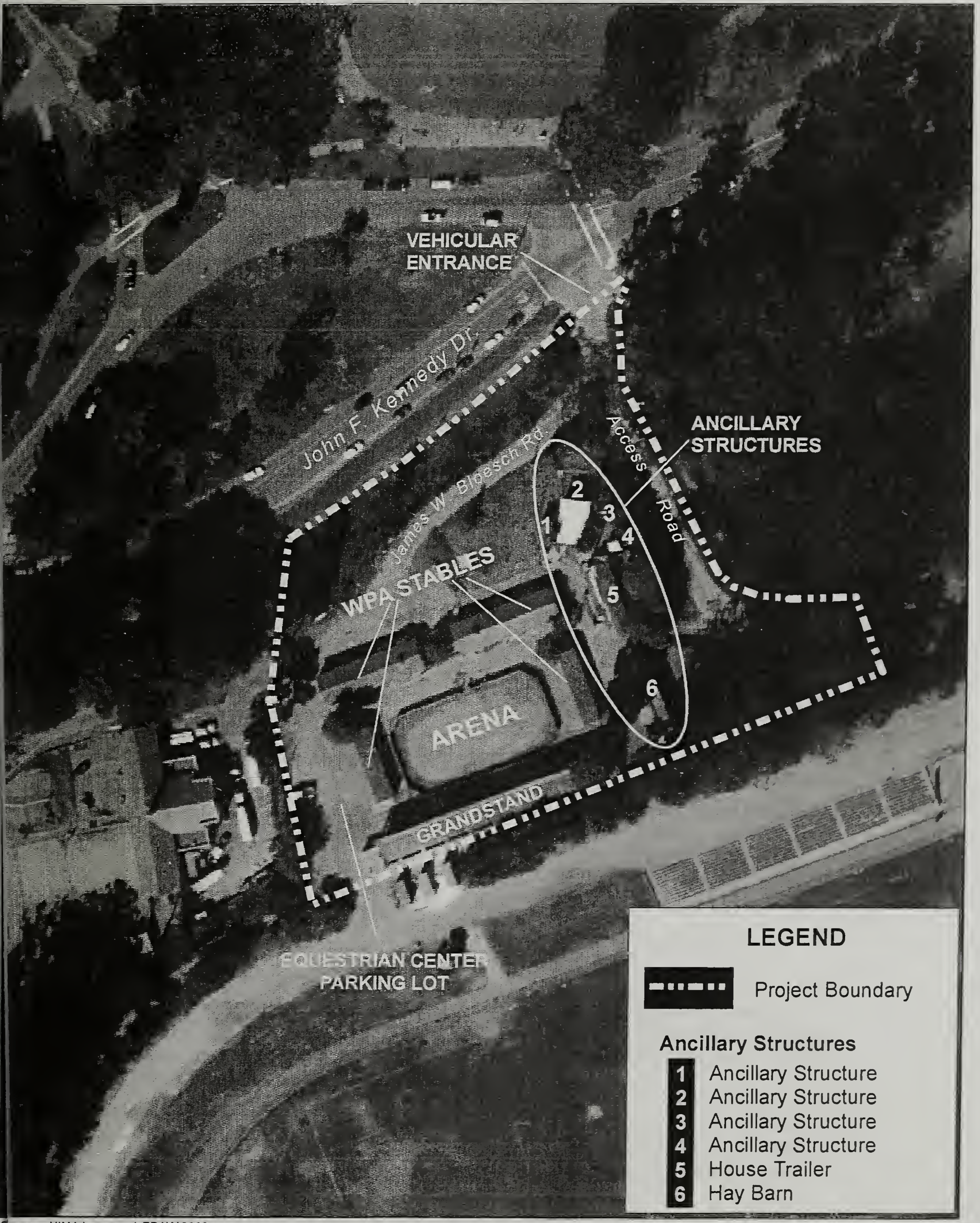

S rce: NIMA Imagery / EDAW 2006

Scale 1 : 1200
1" = 100 ft

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Figure 2
Existing Conditions

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when the exposition was moved to what is now the Marina district. Twenty (20) horse stalls were later constructed (most likely before 1938) under the grandstand to board polo ponies. The four stable buildings surrounding the arena were built as part of the WPA project in 1939.

GGP was nominated to the National Register of Historic Places (NRHP) in September 2003 and listed in October 2004. The nomination lists over 150 individual features, of which 124 are listed as contributing. The GGP Stadium and the GGP Stables (WPA Stables) are listed as contributing features in the nomination. The grandstand structure is not listed as an individual feature, but rather as part of the two contributing features, the GGP Stadium and the GGP Stables.[1]

Equestrian activities have historically been an important and historic use in GGP since the park was first created in 1870. This historic use is evidenced by the numerous designated bridle trails in the park and in other park features such as the Speedway Meadow, which takes its name from an area that was designated for fast riding and from the Polo Field and GGP Equestrian Center. Since the GGP Equestrian Center closed in 2001, this historic use has been limited to the San Francisco Police Department's (SFPD) Mounted Unit, adjacent to the GGP Equestrian Center site on the west.

PROPOSED PROJECT

Goals and Objectives

The goal of the Proposed Project is to bring the historic activity of horseback riding back to GGP. Before the stables were closed in 2001, GGP was one of the last urban parks in the country to offer horseback riding. The GGP Master Plan identifies a set of objectives and policies to "preserve Golden Gate Park's contribution to the diversity of cultural, natural, and recreational resources available to park visitors from San Francisco, the Bay region, and elsewhere.[2] Golden Gate Park should be recognized as an important American cultural resource". The objective and policy applicable to the Proposed Project include the following:

> *Objective V – Recreational Uses and Facilities*
> *Ensure that recreational uses of Golden Gate Park are appropriate to the park environment and purpose.*
>
>> *Policy B – Equestrian Facilities*
>> *The programs of the equestrian facility should serve a broad spectrum of users. Designated equestrian trails should be adequately designed and maintained to provide a firm surface and to minimize erosion. The existing equestrian facilities should be renovated to meet the requirements of building codes and regulations, accessibility, and animal welfare.*

---

[1] Royston Hanamoto Alley & Abey. *GGP Stadium Grandstand Structure Historic Assessment.* May 18, 2004.

[2] San Francisco Recreation and Park Department (SFRPD). *Golden Gate Park Master Plan.* 1998. Prepared by Royston Hanamoto Alley &Abey.

The GGP Master Plan identifies the GGP Equestrian Center as needing improvements, including the possibility of covering the arena, adding a perimeter fence for night security, and replacing temporary structures with permanent ones, including structures to house a caretaker's unit and other uses. The Proposed Project would make the improvements identified in the GGP Master Plan to renovate the facilities to meet the requirements of building codes and regulations, accessibility, and animal welfare.

The objectives of the Proposed Project are to:

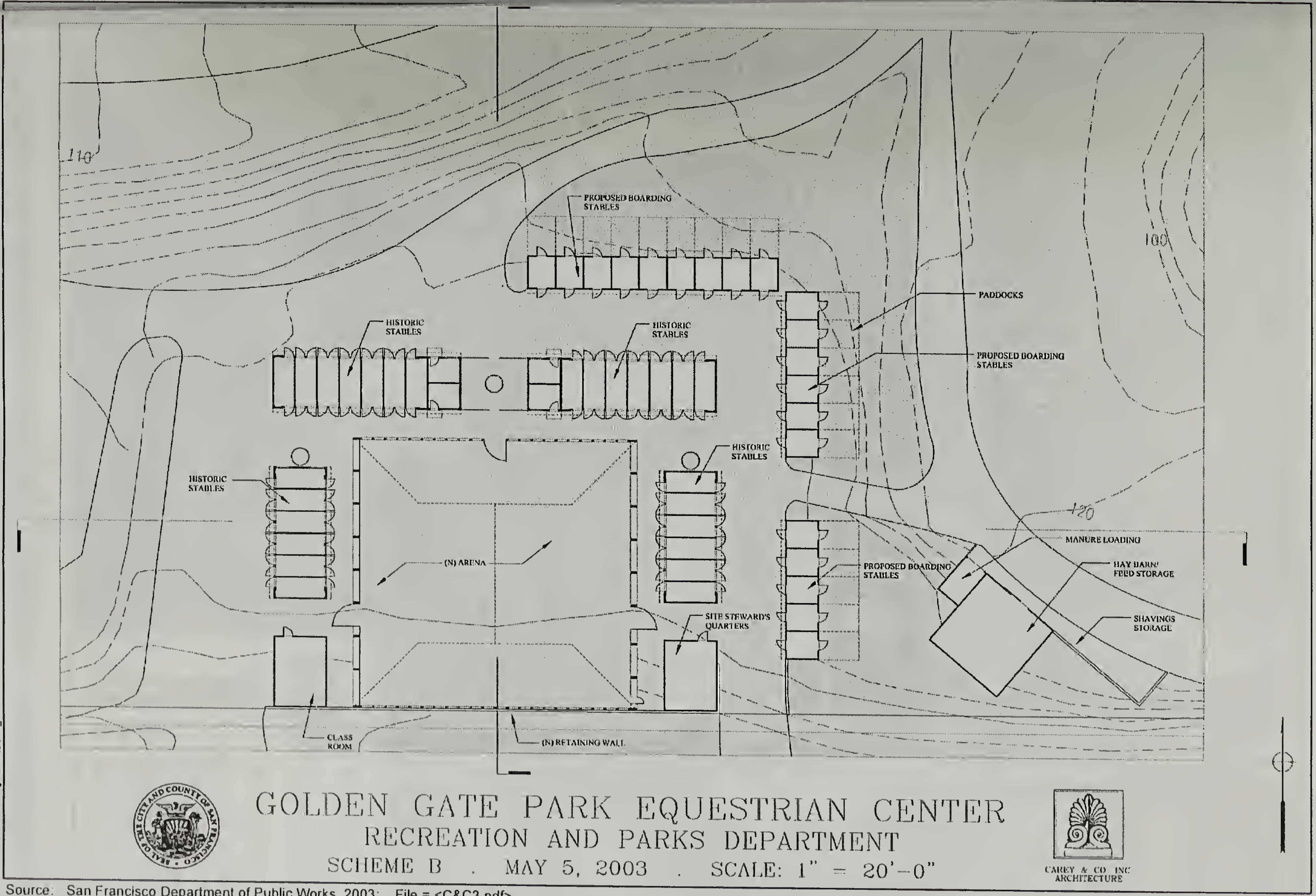
- Rehabilitate the WPA stables to meet requirements of building codes and regulations;
- Provide accessible riding instruction and programs to the general public;
- Have a financially self-supporting facility; and,
- Provide a healthy equine environment.

Project Components

The Proposed Project components and corresponding actions and elements are outlined in Table 1 below. Please also refer to Figure 3 – Proposed Site Plan and Figure 4 – Structures Proposed for Demolition. While the final materials have not been chosen for the new structures, the Project Sponsor has stated that the Proposed Project would complement the existing architecture in style, massing, and materials.

Table 1
Proposed Project

Component	Proposed Actions and Elements
A. WPA Stables	• Seismic and building code upgrade. • Rehabilitation of structures, including interior stall reconfiguration.
B. Arena	• Expansion and covering of existing arena. • Installation of retaining wall along south end of expanded arena.
C. Grandstand and Ancillary Structures	• Demolition of entire grandstand and existing ancillary structures.
D. New Construction/Other	• Construction of two apartments. • Construction of barn and manure bunker • Construction of tack room/office/classroom • Construction of three boarding stable buildings with a total of 20 stalls. • Resurfacing of pathways, road, and parking lot • Landscape improvements • Installation of perimeter fencing • Roadway and parking reconfiguration
E. Use of Trails	• Use of multiple-use trails between GGP Equestrian Center, Redwood Ring, Bercut Equitation Field, Dressage Ring, and Little Speedway Ring.


110
PROPOSED BOARDING STABLES
100
PADDOCKS
HISTORIC STABLES
HISTORIC STABLES
PROPOSED BOARDING STABLES
HISTORIC STABLES
HISTORIC STABLES
120
MANURE LOADING
(N) ARENA
PROPOSED BOARDING STABLES
HAY BARN/ FEED STORAGE
SITE STEWARD'S QUARTERS
SHAVINGS STORAGE
CLASS ROOM
(N) RETAINING WALL
GOLDEN GATE PARK EQUESTRIAN CENTER
RECREATION AND PARKS DEPARTMENT
SCHEME B . MAY 5, 2003 . SCALE: 1" = 20'-0"
CAREY & CO INC ARCHITECTURE

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Source: San Francisco Department of Public Works, 2003: File = <C&C3.pdf>

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Figure 3
Proposed Site Plan

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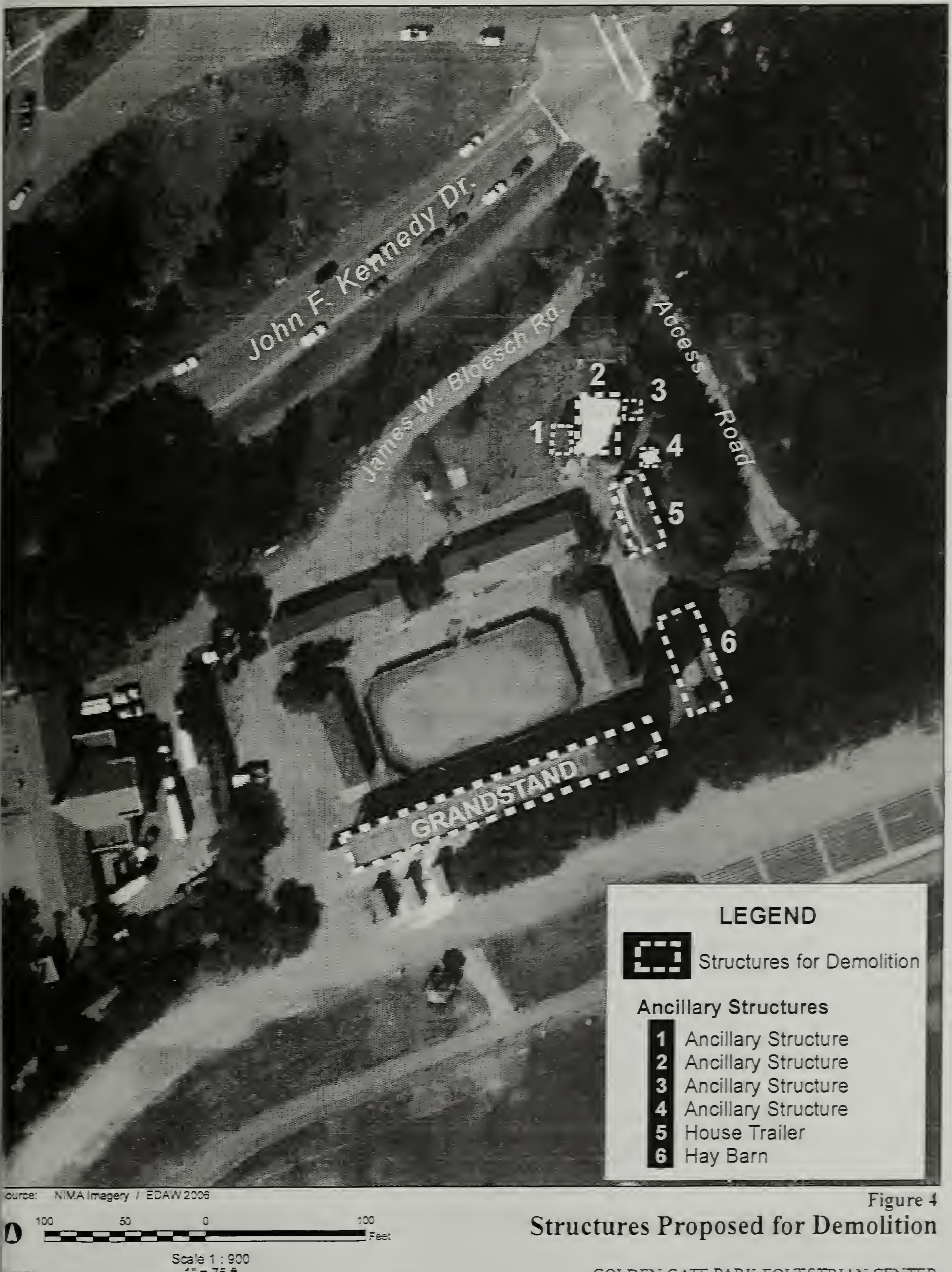

ource: NIMA Imagery / EDAW 2006

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Figure 4

Structures Proposed for Demolition

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Component A. WPA Stables

One of the main components of the Proposed Project would be the rehabilitation of the WPA Stables. The interior and exterior of the WPA stables would be rehabilitated to meet current seismic and building code standards. The current size of each stall is not adequate to house standard-sized horses. The Proposed Project would reconfigure the stalls by removing a portion of the central wall such that each stall would double in size and measure 10 feet 10 inches x 18 feet. To create these larger stalls, the internal walls, which run lengthwise, would be removed and the existing horizontal walls running between each stall would be seismically strengthened. The interior walls of the WPA Stables can be changed without undermining the integrity of the structures or impacting the exterior facade. These stalls are proposed to house school horses, used in teaching and training. Increasing the size of the WPA stalls would decrease the number of stalls from 52 to 26. The construction of 20 new stalls is described in Component D below.

Component B. Arena

The arena is significant to the overall configuration of the stables and is the centerpiece of the Equestrian Center. The demolition of the grandstand would allow for the expansion of the arena to 130 feet by 122 feet. The expanded arena would be covered, lit, and have a height of 34 feet at the roof peak. The purpose of the covered and lit arena would be to allow equestrian use in poor weather and lessons in the evening. In addition, the expanded arena would allow for more than one activity to take place at the same time. Expansion of the arena would require the removal of a eucalyptus tree currently at the southeast corner of the project site. A retaining wall would be constructed along the south end of the expanded arena to protect the integrity of the all-purpose trail running east-west on the southernmost side of the site.

Component C. Grandstand and Ancillary Structures

The grandstand structure occupies an area of approximately 5,000 square feet. Due to its deteriorated condition, a Carey & Co. report of the grandstand concluded that successful restoration of the structure is unlikely.[3] The grandstand's deteriorated conditions pose a threat to the safety of the general public, because of its poor condition.[4] Demolition of the grandstand would allow for the expansion of the arena and result in the loss of 20 stalls. Demolition and removal of the hay barn, mobile home, and four small structures would open approximately 3,500 square feet of space to the east and north of the WPA stables. The demolished materials would be removed from the site and transported by trucks to Altamont landfill.

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[3] Carey & Co. 2002. *Historic Resource Evaluation Equestrian Center, Golden Gate Park, San Francisco, California.*

[4] This initial study discusses and a focused environmental impact report will assess the proposed grandstand demolition and potential impacts to cultural and historic resources. Please refer to Section E, Topic 4.

Component D. New Construction/Other

Three new stable buildings are proposed. They would total 4,000 square feet and house 20 stalls measuring 12 feet x 14 feet each. The new stalls are proposed to allow for possible private boarding. Each stall would have individual paddocks measuring approximately 12 feet x 16 feet to allow for exercise and enhanced contact with other horses. The new stalls and the increase in the size of the WPA stables would result in a total of 46 stalls.[5] Two apartments totaling 1,400 square feet that would serve as the site steward and night manager's quarters are proposed to the east of the expanded arena and south of the east WPA stable. A new classroom/tack room/office building is proposed to the west of the expanded arena and south of the west WPA stable, totaling 1,400 square feet. The classroom/tack room/office building would provide a common use space for the Proposed Project. Designs for these facilities have not been completed. However, these new structures would be designed to be complementary to the WPA Stables' architecture and features. A hay barn and feed storage building of 1,600 square feet would be built against and into the hill on the southeastern most area of the site. This building would be located on a primary access road, where larger deliveries can be made efficiently. A 200 square foot manure bunker would be located adjacent to the barn. A shavings storage area would be located to the east of the new hay barn and feed storage structure.

Component E. Use of Trails

The GGP Equestrian Center is located near four arenas, which can be used for horse turnout. Little Speedway Ring is located adjacent to the southwest end of the GGP Stadium and south of the Fly Casting Pools. Redwood Ring is located to the east of the site, just northeast of the GGP Stadium. Bercut Equitation Ring and a dressage ring are located further away west of Chain of Lakes Drive and north of Martin Luther King Jr. Drive. These arenas would be accessed by the GGP Equestrian Center horses via multiple-use paths.

Schedule for Proposed Project Implementation

Construction staging would take approximately one month. The demolition of the Grandstand, hay barn, converted house trailer, and four small structures would take approximately one month. Rehabilitation of the WPA stables would begin after demolition is complete and is expected to take approximately four months. Expansion of the Arena and construction of the new structures would be concurrent with rehabilitation of the stables and would continue for approximately nine months. Construction demobilization would take approximately one month. Transitioning the site to the operator would take approximately one month. Assuming that construction would begin in late 2008, operation of the facility would commence in late 2009.

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[5] A minimum of 40 to 42 stalls would be required to make the operation of the project economically feasible.

Operations

The project site would house a total of 46 horses, which is less than the 52 horses housed onsite during the previous operation. A caretaker and steward would live on-site full time. A caretaker is required to observe animals daily as required by the U.S. Department of Agriculture. There would be a total of approximately six (6) employees at the site, which would include one stable manager, two caretakers (day and night shifts), and three trainers. The equestrian lessons would be offered throughout the day, and would determine when the teachers would be on-site. The stables would provide possible private boarding to assist in achieving a financially self-supporting facility.

Horses would be brought on site by horse trailers hitched to trucks. The access road east of the site and the parking lot area would provide room for unloading and loading the horses as necessary. Hay and feed would be delivered once and twice a month respectively, to the hay barn/feed storage structure via the access road along the east end of the site. The veterinarian is expected to make two annual visits per horse, while the farrier is expected to make ten annual visits per horse.[6] The veterinarian and farrier are anticipated to service multiple horses in one visit.

Horses from the proposed GGP Equestrian Center would use the nearby arenas (Redwood Ring, Bercut Equitation Field, Dressage Ring, and Little Speedway Ring), which would be accessed by existing pathways and trails. The project site would not host any large scale shows or exhibitions for equestrian events at the arena. Any events held at the project site would be small and limited to participants at the equestrian center.

B. PROJECT SETTING

PROJECT LOCATION

The project site is the GGP Equestrian Center, located within the boundaries of GGP, Block 1700, Lot 1 (Figure 1 – Location Map), located south of John F. Kennedy Drive between Spreckels Lake, Golden Gate Park Stadium, and Lindley Meadow, and east of the GGP Police Stables. Golden Gate Park, including the project site, is owned and managed by the City and County of San Francisco Recreation and Park Department. The GGP Equestrian Center is located within a P (Public Use) zoning district and OS (Open Space) Height and Bulk District. The Golden Gate Park Master Plan identifies this site as a Major Recreational Area land use zone. The GGP Equestrian Center is served by James W. Bloesch Road, which intersects with John F. Kennedy (JFK) Drive. Surrounding uses include the Police Stables to the west, jogging path and Polo Field to the south, forest area to the east, and JFK Drive to the north. A narrow access road runs west from the GGP Equestrian Center past the Police Stables, which is limited to SFPD or other City use and not part of this project.

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[6] A farrier is someone who shoes horses.

EXISTING CONDITIONS

The GGP Equestrian Center is a 2.06-acre site consisting of five main structures surrounding a central riding arena (Figure 2 – Existing Conditions), and ancillary support buildings. On the southern side stands the largest structure, a concrete grandstand facing the Polo Field with pony stalls built into the north side underneath the seating. Two rectangular WPA stables sited at the east and west edges of the arena are positioned at a right angle to the grandstand. Two more WPA stables are located along the north side, parallel to the grandstand and completing the quadrangle around the riding arena. The stables' stall interiors measure on average 10 feet 10 inches by 9 feet and approximately 15 feet high to the roof peak. The stable interior concrete walls are cracked, soiled, and stained, and exhibit worn, flaking paint. The WPA stables reflect a Spanish Mission revival style of architecture. The stables have a total of 52 stalls and the site was operational and used for boarding horses until September 2001.[7]

The grandstand is approximately 200 feet long, 19 feet high, and made of reinforced poured concrete with eight tiers for seating. The structure is in poor condition and the concrete columns, girders, walls, and roof slab reveal moderate to severe cracking. Foundation settlement also varies up to one foot vertical throughout each row. The stalls beneath the grandstand measure approximately 10 feet by 10 feet 3 inches and reach a height of 6 feet 10 inches at the lowest point in the stall.

The condition of the WPA stables and grandstand are considered fair and poor, respectively.[8] These structures were identified in the Golden Gate Park Master Plan as needing numerous maintenance, structural, and seismic improvements.

The arena is an oval ring measuring 128 feet by 67 feet with chamfered corners and surrounded by the WPA stables to the west, north, and east, and the grandstand structure to the south. The arena is framed by six-by-six wood posts that frame a horizontal wood board fence. Two five-feet square gates formed of a wood frame and chicken wire open in the center of the dirt- and crushed rock-filled arena's north side.

The six ancillary buildings, which include a converted house trailer, hay barn, and four small structures used for tack and equipment storage, are located at the north and eastern edges of the site. They are all in poor condition overall and were built pre-1978. The largest of the four smaller structures was most likely built after 1939 to store hay and feed for the horses before its use as a tack and equipment storage room. The converted house trailer was the living quarters for the stable operator when the site was in use. It is currently vacant and boarded up. The hay barn consists of a wooden shed covered with dilapidated corrugated iron. One side of the hay barn is not covered, which exposes it to wind, rain, and other elements.

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[7] The 20 stalls underneath the grandstand were not used for boarding horses at the time of the facility closure in 2001.

[8] SFRPD. 1998.

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	Applicable	*Not Applicable*
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	☐	☒
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	☐	☒
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	☒	☐

The San Francisco Planning Code (Planning Code), which incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed project conforms to the Planning Code, or an exception is granted pursuant to provisions of the Planning Code. Approval of the proposed project would result in the demolition of a concrete grandstand, a hay barn, a mobile home, and four smaller structures, and construction of three new stable buildings, a two–unit residential structure, a classroom/tack room/office building, a hay barn/feed storage building, and a manure bunker. The specific impacts of this proposed development are discussed below under the relevant topic headings.

The project site is within the Public Use (P) zoning district (Planning Code Section 234), which permits land owned by a governmental agency and use for public purposes. The Proposed Project is located within a larger Public Use District, Golden Gate Park, and would reestablish a traditional use of the site as an equestrian center. This is a principally permitted use in the P zoning district. The entire site is in the Open Space (OS) height and bulk district, in which "the height and bulk of buildings and structures shall be determined in accordance with the objectives, principles, and policies of the General Plan." The inclusion of land in Open Space districts indicates that the principal use of the land is open space with future development limited. The Proposed Project does not require any exceptions from the Planning Code.

The San Francisco General Plan provides general policies and objectives to guide land use decisions. Any conflict between the Proposed Project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with General Plan policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the Proposed Project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the Proposed Project.

The GGP Master Plan provides a framework and guidelines to manage the current and future park and recreation demands, while preserving the historic significance of the park. The project site is identified as a Major Recreational land use zone in the GGP Master Plan, which was established to meet recreational needs. The Proposed Project is consistent with all the policies of the GGP Master Plan, would provide a recreational use, and would not change the land use or propose any changes to the P zoning district and OS height and bulk district.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City Planning Code to establish eight Priority Policies. These policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use and Land Use Planning); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use and Land Use Planning); (6) maximization of earthquake preparedness (Questions 13 a-d, Geology and Soils); (7) landmark and historic building preservation (Question 4a, Cultural Resources); and (8) protection of open space (Questions 8a and b, Wind and Shadow, and Questions 9a and c, Recreation). Prior to issuing a permit for any project which requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action which requires a finding of consistency with the General Plan, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in Section E, Evaluation of Environmental Effects, providing information for use in the case report for the proposed project. The case report and approval motions for the project will contain the Department's comprehensive project analysis and findings regarding consistency of the proposed project with the Priority Policies.

The City and County of San Francisco Planning Department Major Environmental Analysis (MEA) Division has determined that an Environmental Impact Report (EIR) will be prepared for the Proposed Project. Additional review and approvals for the Proposed Project include:

Landmarks Preservation Advisory Board: Review of CEQA document and make recommendations to Planning Department and Planning Commission regarding projects pertaining to historic resources.

City and County of San Francisco Recreation and Park Commission: Approval of conceptual plan and adoption of environmental findings.[9]

City and County of San Francisco Planning Department: Major and Minor Alteration Permit review and approval.

City and County of San Francisco Planning Commission: Review and certification of CEQA document.

City and County of San Francisco Arts Commission: Review of all new and renovated civic construction projects to ensure design quality of City structures.

City and County of San Francisco Department of Building Inspection and Public Works: Demolition Permit and Building Permit review and approval.

City and County of San Francisco Department of Public Health: Stable permit.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially significantly affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

☐ Land Use
☐ Aesthetics
☐ Population and Housing
☒ Cultural Resources
☐ Transportation and Circulation
☐ Noise
☐ Air Quality
☐ Wind and Shadow
☐ Recreation
☐ Utilities and Service Systems
☐ Public Services
☐ Biological Resources
☐ Geology and Soils
☐ Hydrology and Water Quality
☐ Hazards/Hazardous Materials
☐ Mineral/Energy Resources
☐ Agricultural Resources
☒ Mandatory Findings of Signif.

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[9] The Proposed Project design was adopted by the Recreation and Park Commission in June 2003 as Resolution No. 03-06-04.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
1. LAND USE AND LAND USE PLANNING—Would the project:					
a) Physically divide an established community?	☐	☐	☐	☒	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒	☐
c) Have a substantial impact upon the existing character of the vicinity?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Golden Gate Park (GGP) is a large urban park in San Francisco containing 1,017 acres (4.1 km^2). It is in the shape of a long rectangle about ½ half mile wide from north to south and 3 ½ miles long east to west.[10] GGP, located in the northwestern part of the City, is surrounded on the north, east and south by urban development. The Great Highway, Ocean Beach and the Pacific Ocean are to the west. U.S. Highway 101, which crosses GGP at 19th Avenue, provides access to the Golden Gate Bridge to the north and Peninsula communities to the south.

Predominantly single- and multi-family residential areas in the Richmond and Sunset Districts adjoin GGP on the north and south respectively. Schools, churches, hospitals and neighborhood serving retail uses are also located within these districts. St. Mary's Medical Center, and the University of San Francisco are important land uses near GGP's northeastern end. The University of California Medical Center is located near GGP's southeastern end. The Haight-Ashbury District, which contains mixed commercial and residential uses, is located south of the GGP Panhandle to the east.

The project site is located entirely within GGP (Block 1700, Lot 1). It is located south of JFK Drive between Spreckels Lake, Golden Gate Park Stadium, and Lindley Meadow, and east of the GGP Police Stables. GGP, including the project site, is owned and managed by the City and County of San Francisco Recreation and Park Department. The Golden Gate Park Master Plan identifies this site as a Major Recreational Area land use zone. The GGP Equestrian Center is served by one vehicular entrance at the intersection of John F. Kennedy Drive and James W. Bloesch Road. There is a narrow access road that runs west from the GGP Equestrian Center past the Police Stables, which is limited to SFPD or other City department staff use and not part of this project.

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[10] SFRPD. *Golden Gate Park Master Plan.* 1998. Prepared by Royston Hanamoto Alley & Abey.

The project site was in use as a public equestrian center until it closed in 2001. Existing structures at the project site include one residential unit (converted trailer home), 56 WPA stables, arena, ancillary structures, and parking lot. The GGP Equestrian Center is a 2.06 acre site consisting of an arrangement of five structures surrounding a central riding arena. On the southern side stands the largest structure, a concrete grandstand with pony stalls built into the north side underneath the seating. Tables 2 and 3 list current uses in GGP and at the project site.

Table 2
Existing Land Uses in Golden Gate Park

Existing Land Use	**Location**
California Academy of Sciences	East of Stow Lake near Music Concourse
Conservatory of Flowers	Located at the eastern end of the park, just off Conservatory Drive.
Garden of Shakespeare's Flowers	Martin Luther King Jr. Drive and Middle Drive East.
Japanese Tea Garden	Located just east of Stow Lake, between JFK and Martin Luther King Jr. drives
M.H. de Young Museum	Tea Garden Drive
San Francisco Botanical Garden at Strybing Arboretum	The main entrance is on Ninth Avenue at Lincoln Way.
Archery field	Fulton Street between 45th and 46th Avenues
Basketball	Located in the Panhandle at the eastern end of the park on Masonic Street, between Oak and Fell Streets.
Golf	West end of the park. The clubhouse entrance is near 47th Avenue, between JFK Drive and Fulton Street
Kezar Stadium	755 Stanyan Street
Lawn Bowling	Bowling Green Drive, between Middle Drive East and MLK Jr. Drive
Spreckels Lake	Located between Fulton and JFK Drive near 36th Avenue
Stow Lake	Located at Park Presidio Drive and MLK Jr. Drive
Tennis	Twenty-one courts are located at the eastern end of the park
Children's Playground	Located at MLK Jr. Drive and Bowling Green Drive
McLaren Lodge	Located at Fell and Stanyan Streets
Music Concourse and Pavilion	In the Eastern Park area near the California Academy of Sciences
Picnic Grounds	Barbecue pits are located between Marx Meadow and Speedway Meadow, near JFK Drive
Strawberry Hill	Located at Stow Lake.
Windmills Garden	47 Avenue near Great Highway

Table 3
Existing Land Uses at the Project Site

Category	**Existing Uses**
Structures	WPA Stables, Arena, Grandstand, Hay Barn, Converted House Trailer, 4 small sheds.
Other	Parking lot

DISCUSSION

a) Physically divide an established community?

The Proposed Project would not physically divide an established community because the facilities have been a part of GGP for the last 70 years, comprise only two acres in the 1,017-acre park, and would reestablish and retain the use of the site for equestrian purposes, which is also a historic recreational activity in GGP. The SFPD stables and other recreational uses in GGP would continue. The Proposed Project does not create a change in land use, and would therefore have no impact.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The GGP Master Plan identifies this site as a Major Recreational Area land use zone, which was established to meet recreational needs. The Proposed Project is consistent with all policies of the GGP Master Plan, would provide a recreational use, and would not change the land use or propose any changes to the P (Public Use) zoning district and OS (Open Space) Height and Bulk District. The Proposed Project would have no impact on any plan, policy, or regulation applicable to the site.

c) Have a substantial impact upon the existing character of the vicinity?

The Proposed Project components would improve the physical condition of the site by demolishing dilapidated structures, rehabilitating the WPA stables, and constructing new structures consistent in scale and mass with the historic structures on the site. The Proposed Project does not propose a change in the historic use of the site, nor would it change the pattern, scale or character of uses in the general area of the site such that it would have a substantial impact upon the existing character of the vicinity. Beneficial impacts to the existing land use character would occur.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
2. AESTHETICS—Would the project:					
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	☐	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	☐	☐	☒	☐	☐

ENVIRONMENTAL SETTING

GGP was originally marked on maps as part of the "great sand waste." After its development into a park, its visual character has come to be defined by meadows, forest areas, lakes, recreation areas, gardens, and buildings. The forests were primarily planted on slopes and hills to provide shelter from the winds for the meadows located in the valleys.[11] GGP is also characterized by mature pine and cypress trees that create the park's unique skyline.

The project site and its vicinity are surrounded by meadows, open spaces, and forest areas. From the eastern end of the site, views are limited to short-distance views to the access road and forested area. The western end includes short-distance views to the equestrian center parking lot and the SFPD stables perimeter fence. The northern end has limited views toward John F. Kennedy (JFK) Drive and Spreckels Lake, which is largely obscured by the landscaping along JFK Drive. The southern end includes views to the Polo Field. Because the project site is at a slightly higher elevation than surrounding areas, views from surrounding areas to areas beyond the project site are obstructed by the site itself.

The project site is characterized by development that is mostly in a state of disrepair and non-use. A grandstand exists along the southern end of the site, and a central arena, four WPA stable buildings, and a dilapidated hay barn are in the eastern portion. A converted house trailer and four small ancillary structures are in the northeast portion of the site (Please refer to Figure 2 – Existing Conditions). All of the buildings have been boarded up to prevent unauthorized access.

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[11] SFRPD. 1998.

The grandstand is a 202 foot long, reinforced, poured concrete structure which faces south towards the Polo Field. It has eight tiers for seating, and 20 horse stalls installed beneath. The north façade of the grandstand has a total of 21 columns, spaced ten feet apart from the center of each column, and finished with cream painted plaster cement. Due to the deteriorated condition of the grandstand, its north side is fenced off with a chain link fence, which serves as a safety precaution from the crumbling concrete and to prevent unauthorized access.

The WPA stables are Spanish Mission Revival style that features terra cotta, barrel tiled, and gabled roofs. The ancillary structures on the east and northeast portion of the site are in poor condition and also boarded up. The pathways within the site are overgrown with weeds and cracked concrete, contributing to the site's unattended appearance.

Existing lighting consists of exterior lights on the WPA stables and two flood lights on a pole that stands approximately forty feet high just north of the arena. Three acorn-style luminaire lights on traditional poles are located along James Bloesch Road.

DISCUSSION

a) Have a substantial adverse effect on a scenic vista?

The GGP Master Plan's Park Landscape section identifies important vistas within the Park. The closest important vista in the vicinity of the project site is the view towards the bison paddock from a point on JFK Drive, approximately 900 feet west of the intersection of James Bloesch Road and JFK Drive. The Proposed Project is not within this area, nor would it block or visibly alter this important vista. Public views in the project area consist of a combination of natural and developed features. Surrounding areas are at a lower elevation than the project site. This difference in elevation, in concert with landscaping along JFK Drive and existing buildings, results in there being no views beyond the site from points along its perimeter. The new structures of the Proposed Project would not obstruct or substantially degrade scenic views from surrounding areas. No impacts would occur.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The City and County of San Francisco has two eligible state scenic highways (I-80 and Route 1). California's Scenic Highway Program was created in 1963 with the purpose to preserve and protect scenic highway corridors from change, which would diminish the aesthetic value of lands adjacent to highways. The Scenic Highway Program is governed by the Streets and Highways Code, Section 260 et seq. However, I-80 and Route 1 are not officially designated or located near the project site. The project site is not located within a state scenic highway and would therefore have no impacts on trees, rock or outcroppings within a state scenic highway.

Although not a state designated scenic highway, San Francisco's 49-mile scenic drive meanders through GGP.[12] Part of this scenic drive is along JFK Drive, which passes by the project site. The new arena would be partially visible from JFK Drive; however, it would not adversely alter or diminish views of the area along the 49-mile scenic drive. The dominant elements of the scenic drive in this area consist of views of Spreckels Lake and the Bison Paddock located north of JFK Drive. These views would not be diminished as a result of the Proposed Project. No impacts would occur.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

The Proposed Project would result in a short-term reduction in the visual quality of the site during the demolition and construction phases due to the presence of construction equipment and activity. The demolition of ancillary structures and the grandstand would occur first, followed by the rehabilitation of the WPA stables and construction of the new structures. However, this reduction in visual quality as a result of construction and demolition activities would be temporary and therefore less than significant.

The Proposed Project at completion would change the existing visual character of the site, but not in a way such that it would amount to a substantial degradation of the visual character. Most of the visual change would be a beneficial effect of the Proposed Project. The Proposed Project elements would improve the visual character of the area compared to the existing dilapidated condition of the site. The WPA stables would be rehabilitated, the parking lot and pathways would be repaved, landscaping would be improved, and the unsightly dilapidated ancillary structures would be demolished, removed, and replaced. The new stables would occupy a space slightly larger than the ancillary structures. The Proposed Project would retain the original use of the site for equestrian purposes as well as improve the physical and aesthetic condition of the WPA stables.

Although a final design has not been selected, the new structures would be required to be visually consistent and architecturally harmonious with the WPA stables, such that the architectural character of the site is maintained. The design of the new structures would be reviewed for consistency at the time the City and County of San Francisco Planning Department reviews the architectural, design, and elevation plans of the project. The type and material of the perimeter fencing also would be reviewed during the design review stage, which would ensure that the fencing is compatible with the visual quality of the site. The covered arena would be approximately 34 feet high and located in the center of the site, where the current arena and grandstand exist. The covered arena would be the most noticeable change to the project site. The

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[12] The 49-mile scenic drive was created as a promotion for the 1939 Golden Gate International Exposition. The original route started near the Civic Center downtown, meandered through the City, and ended at Treasure Island. The current route is essentially the same, except it makes a loop through the City rather than ending at Treasure Island. Available at http://en.wikipedia.org/wiki/49-Mile_Scenic_Drive. Accessed August 2006.

GGP Master Plan identified the project site's improvements, which included recommending a covered arena and therefore this visual alteration of the site is consistent with the goals for GGP. Therefore the Proposed Project would not result in a substantial adverse effect on the visual character of the site. Impacts are less than significant.

d) **Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?**

Lighting in GGP is generally limited to the roads and around buildings for security. Most areas in GGP are not intended for night use and therefore not lighted, or have minimal lighting. The demolition and construction phase of the Proposed Project would only occur during the day. Therefore new sources of light would not occur as a result of construction. The rehabilitation of the WPA stables and construction of new structures would not use reflective or mirrored glass, which is prohibited by City Planning Commission Resolution No. 9212. Additionally, the use of such materials would not be consistent with the conceptual architectural treatment proposed as part of the project, and would not be aesthetically compatible with the project site. No new sources of glare would occur.

Exterior lights on the new structures would emit low levels of light and would not substantially increase light levels in the area. The project site is identified in the GGP Master Plan as a potential night use area and nighttime lighting is therefore anticipated. However, most of the nighttime lighting would be in the service of evening lessons, which would take place within the covered arena. This would prevent substantial light spill onto areas surrounding the project site during evening equestrian uses. The closest residences to the site are approximately 1,000 feet to the north along Fulton Street. Therefore, lighting at the site would not be visible outside of the immediate area due to the landscaping along JFK Drive and the park perimeter and screen planting along Fulton Street. Lighting in the areas surrounding the arena and stables would be used primarily only in the evening hours and would not be expected to be needed late at night. In addition, lighting used at the site would be required to be energy efficient. Light and glare impacts would be less than significant.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
3. POPULATION AND HOUSING— Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐	☐
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	☐	☐	☐	☒	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

GGP attracts between 11 and 15 million visitors per year and generally during daylight hours. The project site falls within District 5 of the GGP Landscape and Custodial Maintenance section. District 5 employs a total of thirteen (13) custodians, four (4) environmental service workers, and fifty three (53) gardeners.[13]

DISCUSSION

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The construction and implementation of the Proposed Project would not induce population growth, displace residents or employees, or affect housing demand and supply. The project site is an existing and developed area, though it is currently unoccupied. The Proposed Project would reestablish a previous use of the site and result in increased use of the property; however, this would not induce population growth in the surrounding area. New structures proposed include two apartments, which would serve as living quarters to accommodate the equestrian center's caretaker and steward, who would live on-site full time. On-site supervision is required by the U.S. Department of Agriculture to provide security for horses at the stables. The living quarters would not constitute a significant increase in population in the area. The project site is served by existing roads and infrastructure and would not require an extension of either. Therefore the Proposed Project would not induce population growth directly or indirectly. Impacts to population and housing would be less than significant.

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[13] City and County of San Francisco. *San Francisco Recreation and Parks Department Employee Staffing by Property.* Available at http://mission.sfgov.org/RPDPropC/ParkSched.aspx. Accessed August 2006.

b-c) Displace substantial numbers of existing homes or people, necessitating the construction of replacement housing elsewhere?

The project site is currently unoccupied and there are no existing homes on the site. Recreation and Park Department employees would continue to perform park maintenance and related activities without job displacement. The Proposed Project's construction and operation would occur within the existing boundaries of the Golden Gate Park and residents in the Sunset or Richmond neighborhoods would not be displaced. Construction workers are expected to be from the Bay Area. They would commute to the site from within the Bay Area and would not generate an additional demand for housing in San Francisco. Employees would be hired for the Proposed Project's operations. However they are expected to come from the existing labor pool in the area. Construction and implementation of the Proposed Project would not displace any homes or people, nor would it necessitate the construction of replacement housing elsewhere. No impacts would occur to homes or people.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
4. CULTURAL RESOURCES— Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco *Planning Code*?	☒	☐	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

GGP has a history stretching back almost 150 years. Frederick Law Olmsted, traveling in California in 1866, proposed the concept of a public park for San Francisco. In 1870, the newly formed park commission advertised bonds to fund park improvements. Engineer William Hammond Hall completed his survey report on February 15, 1871 of the proposed park land, an area of sand dunes in the western quarter of San Francisco known as the "Outside Lands." Hall and his crew began the transformation of the sandy 1,017 acre park tract between Stanyan Street and the Pacific Ocean into picnic grounds, woodland forests, gardens, recreation areas, which welcomed the first visitors in 1872.

The GGP Stadium (Polo Field) was constructed in 1909 as a scaled down version of the world's largest amphitheater, proposed to be designed by architects James and Merritt Reid. As noted by the 1910 Park Commissioners Report, the GGP Stadium was designed by A.B. Spreckels and John McLaren. The grandstand was to provide seats for 100,000 spectators and the grassy terrace was to provide space for 60,000 additional visitors. Groundbreaking ceremonies were held October 14, 1911 in the Polo Field in GGP in anticipation of the hosting of the 1915 Panama-Pacific International Exposition. Originally planned for the 1915 Panama-Pacific International Exposition, the completion of a grand stadium at the site was rejected due to the cold, exposed location in the western park and lack of transit access. Instead, the southeast corner of GGP, on Stanyan Street was chosen, and Kezar Stadium was developed. This halted further development of the GGP Stadium, where only one experimental section of the grandstand and a judge's stand had been constructed. When the park stables were constructed in 1938, the back side of the lone grandstand was incorporated into the new stables. The grandstand structure formed one side of the quadrangle of stables, which enclosed the riding ring.[14]

The GGP Equestrian Center consists of an orthogonal alignment of five structures surrounding a central riding area. The five 1938 stucco-sided buildings of the Equestrian Center form a quadrangle around the oval 128 feet x 67 feet riding arena, which is centered between two flanking stables. The four Spanish Mission Revival single-story concrete stables were built in 1939 by the WPA and feature terra cotta, barrel tiled, and gabled roofs. On the south side of the center is the concrete grandstand with horse stalls beneath the seating. Two rectangular stables, positioned perpendicular to the grandstand, are located to the east and west of the arena. The other two stables are located to the north, parallel to the grandstand.[15]

To the northeast behind the stables are four smaller structures which were used as storage or tack rooms (Ancillary Structures 1-4 in Figure 2), a converted trailer house (Ancillary Structure 5 in Figure 2), and a hay barn (Ancillary Structure 6 in Figure 2). The structure identified as Ancillary Structure 2 was likely the principal building used for the storage of feed for the horses prior to its use as a storage or tack room. This structure is sided with random width thick horizontal boards or planks. It has a shallow gabled roof that may have been reconstructed based upon the roof sheathing. On either end gable are pairs of doors with cross-bracing and butterfly hinges. The lower portion below the upper doors appears to have been filled with wooden planks. The opening appears to once have supported two larger doors. The structure rests on a concrete perimeter foundation faced with clay brick. The upper gable vents have been enclosed with modern fiberglass panels and have openings on the sides of the building. Plywood siding now covers part of the structure's skirt.

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[14] Carey & Co., Inc. *Historic Resource Evaluation Equestrian Center, Golden Gate Park San Francisco California*, September 2002. This document is on file and available for public review by appointment at the Planning Department, 1660 Mission Street, 5th Floor, as part of Case File No. 2004.1094E.

[15] Carey & Co., Inc. 2002.

The grandstand is the earliest structure in the Equestrian Center, and was constructed in 1909 at a cost of $8,440.95.[16] The grandstand is a 202 foot long reinforced poured concrete structure, which faces south towards the Polo Field, offering eight tiers for seating, with 20 horse stalls installed beneath. The wood stall doors open to the north, behind a loggia of Spanish Mission Revival archways opposite the riding arena. The symmetrical seating arrangement provides ten access stairs at seventeen feet on center. A two-foot nine-inch wall at the toe of the second tier spans the length of the bleacher with three-foot openings cut into each stair. Each tier rises one foot five-inches with a two-foot eight-inch depth. The remnants of iron bolts inserted into the unfinished concrete riser of each tier indicate the historic existence of former seat backs. The bleacher is topped with a three-foot five-inch high wall at the back top tier. Iron pipe handrails, not original to the structure, were inserted at the east and west ends. The finished grade drops about three feet from the south to the north side of the bleacher, providing more height to the stable façade on the south side. The north façade of the grandstand is classically organized by 21 rectangular columns, spaced at ten feet on center, and finished with cream-painted plaster cement. Simple lines articulate the two-feet by one-foot columns that stand an average of eight-and-one-half-feet high, carrying semicircular arches above. A projecting cornice provides protection from the weather to the wall and arcade below. The façade is capped by an articulated parapet, which also serves as the back wall to the bleacher.[17]

Historic resources are recognized as part of the environment under CEQA (PRC 21084.1). The California Register is the authoritative guide to the State's historical resources and to which properties are considered significant for the purposes of CEQA. The California Register includes resources formally determined eligible for, or listed in, the National Register of Historic Places (NRHP). GGP has been nominated to the National Register under Criterion C, for landscape architecture, and Criterion A, for recreation and social history.[18] GGP consists of 133 contributing and 56 non-contributing resources. The GGP Polo field is one of 47 contributing sites, while the GGP Stables is six of the 37 contributing buildings. Therefore, due to its listing in the National Register and California Register, GGP is considered a historic resource for the purposes of CEQA.

The grandstand structure is not listed as an individual feature, but rather as part of two contributing features, the GGP Stadium and the GGP Stables. Both the GGP Stadium and GGP

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[16] San Francisco Municipal Reports. 1910.

[17] Carey & Co., Inc. 2002.

[18] Criterion A is defined as property "associated with events that have made a significant contribution to the broad patterns of our history". Criterion C is defined as property that "embodies the distinctive characteristics of a type, period, or method of construction or represents that work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction". The NRHP Nomination for GGP is available for review by appointment at the Planning Department.

Stables are both listed as contributing features in the GGP nomination to the NRHP. The grandstand demolition will be evaluated in the GGP Equestrian Center EIR in relation to its potential effect to the GGP district. A project that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment.[19]

DISCUSSION

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

As discussed above, the GGP Stadium and the GGP Stables are contributing features to the GGP historic district. The potential impacts of the Proposed Project will be evaluated in the EIR to determine whether the demolition of the grandstand, and addition of new structures would affect the historical significance of the project site.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The project site is developed and not known to have any recorded archaeological resources in the immediate vicinity of the project.[20] However, in order to reduce the Proposed Project's impact to archaeological resources to a less than significant level, the SFRPD would be required to implement Mitigation Measure 1 – Archaeological Resources (Accidental Discovery) presented on page 94 of this document.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Proposed Project would involve approximately 1,777 cubic yards of excavation for the preparation of the new structures' foundations.[21] Due to the previous disturbance of the site, and the fact that most of GGP is built on sand dunes, it is unlikely that paleontological resources would be found. No impact is anticipated.

d) Disturb any human remains, including those interred outside of formal cemeteries?

There is no evidence to suggest that any prehistoric or historic-era marked or un-marked human internments are present within or in the immediate vicinity of the Proposed Project area due to the developed nature of the site. No impact is anticipated. However, if any human remains are uncovered during the Proposed Project's construction and demolition phases, California Health and Safety Code Section 7050.5[b] requires the project proponent to halt excavation or disturbance of the site until the County Coroner is notified. The Coroner is then required to make a determination and recommendation regarding the human remains. In the event that the remains are those of a Native American, the Coroner would be required to contact the Native American Heritage Commission within 24 hours by phone pursuant to California Health and Safety Code Section 7050.5[c].

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[19] CEQA Guidelines, Section 21084.0

[20] Memo from Randall Dean to Nannie Turrell dated April 28, 2006. This Memorandum is available for public review by appointment as part of Case File No. 2004.1094E at the Planning Department, 1660 Mission Street, Suite 500, San Francisco.

[21] Hobson, Mary. SFDRP. November 2006.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
5. TRANSPORTATION AND CIRCULATION—Would the project:					
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (unless it is practical to achieve the standard through increased use of alternative transportation modes)?	☐	☐	☒	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	☐	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	☐	☒	☐	☐	☐
e) Result in inadequate emergency access?	☐	☐	☐	☒	☐
f) Result in inadequate parking capacity that could not be accommodated by alternative solutions?	☐	☐	☒	☐	☐
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., conflict with policies promoting bus turnouts, bicycle racks, etc.), or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is accessed by James Bloesch Road off of JFK Drive to the north. JFK has two travel lanes going east and one travel lane going west within the project vicinity. Although JFK

Drive is a main east-west roadway through Golden Gate Park, it does not currently experience any traffic congestion problems within the Project Area. High levels of through traffic on JFK Drive exist between Stanyan Street and 10th Avenue, in the eastern side of Golden Gate Park.[22] James Bloesch Road does not experience any traffic congestion as it is mainly used by Park maintenance and SFPD staff going to and from the stables. This area also does not presently experience any parking shortfall.

The intersection of JFK Drive and James Bloesch Rd. is an unsignalized stop sign controlled intersection. On-street parking is available on both sides of JFK Drive.

DISCUSSION

a) **Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?**

Construction Traffic

The construction and demolition phase of the Proposed Project would result in short-term construction traffic. Construction would occur Monday through Friday, which would avoid peak recreation use of GGP during the weekends. Construction workers would either park in the existing parking lot or along JFK Drive. Truck traffic to and from the site would be short-term and consist of hauling the demolition materials off-site and building materials on-site, which could temporarily affect traffic in the vicinity. The pathway immediately south of the site would be temporarily closed during the demolition of the grandstand for safety purposes. Signs would be placed to re-route users to alternate pathways. Because the construction traffic would be temporary, the impact is deemed less than significant.

Operational Traffic

The Proposed Project's operation would result in increased traffic trips to the site; however, the number of trips would not be substantial relative to the existing conditions. Trip generation was estimated based on anticipated staffing, boarders, lessons, camps, hay and feed delivery, veterinary and farrier visits as shown in Table 4 below.

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[22] City and County of San Francisco Department of City Planning. *Final Transportation Study for the Golden Gate Park Draft Master Plan EIR.* Prepared by The Duffey Company. 1996.

Table 4
Estimated Trips

	Annual Trips*	Daily Trips
Employees	4,368	12
Lessons**	24,288	78
Boarders	7,280	20
Camps***	1,584	22
		132
Hay Delivery	24	0.1
Feed Delivery	48	0.2
Veterinary Trips	200	0.6
Farrier Trips	1,000	3.2
	Total Annual 38,792	**Total Daily 136.1**

*Each trip equals entry or exit from site.
**Lesson trips are estimated at 88 per day. However, these trips are decreased during summer months since camps would use approximately half of the school horses. Therefore for 12 weeks out of the year, lesson trips would be reduced by half. Trips for lessons assumes 88 trips/day for 40 weeks, and 44 trips/day for 12 weeks to account for camp trips.
*** Assuming camps occurring during summer months of June to August, or 12 weeks. Camps would use approximately half of the school horses resulting in approximately 22 trips/day. Exclusive daily use of camp horses during this time would result in those horses not used for multiple lessons.
- Trip numbers provided by Department of Recreation and Park.
- Assuming stables in operation 6 days a week, 312 days a year for lessons.

Overall, the Proposed Project would generate an estimated 136 average daily person-trips.[23] It is estimated that the majority of the trips would be made by private automobile. The increase in trips to and from the site would not be significant relative to the existing condition of the street system. Employees and students would be arriving throughout the site's operating hours depending on the lesson time. Because lessons would be offered and provided throughout the day, trips to and from the site would be dispersed throughout the day, rather than concentrated during peak traffic hours. The parking demand resulting from the Proposed Project would be accommodated by the existing parking spaces.

The Proposed Project would add a small increment to the cumulative long-term traffic increase on the local roadway network. The change in area traffic as a result of the project would be undetectable to most drivers. Therefore, the impact is less than significant.

Stop sign controlled movements are usually subject to delay at unsignalized intersections. Since unsignalized intersections typically are susceptible to lower traffic volumes, motorists tend to tolerate less delay than they do at signalized intersections. Therefore the level of service delay thresholds are lower and only pertain to stop sign controlled movements. The Transportation

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[23] Assumption that stables operate 6 days a week, totaling 312 days out of the year based on previous use of site.

Study conducted for the GGP Draft Master Plan identified congested stop sign controlled movements during weekday peak periods at westbound left-turn at Stanyan Street/Fell Street, eastbound left-turn at Kezar Drive/JFK Drive, eastbound and southbound approaches at Sunset Blvd/MLK Jr. Blvd., and northbound left turn at 3rd Avenue/Lincoln Avenue. These intersections are not in the immediate vicinity of the project site and would not be subject to project-related traffic.

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (unless it is practical to achieve the standard through increased use of alternative transportation modes)?

The San Francisco County Transportation Authority's Congestion Management Program (CMP) roadway network includes all freeways and state highways, and principal arterials. The principal arterials are based on the major arterials designated in the Transportation Element of the City's General Plan.[24] Fulton and Lincoln west of 19th Avenue and Sunset Avenue would be the primary access roads to the project site. These roads are non-CMP arterials and are not part of the CMP. Traffic generated by the Proposed Project would not affect CMP arterial level of service standards. Impacts would be less than significant.

c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?

The project site is not located within an airport land use plan area of in the vicinity of a private airstrip. Therefore, significance criterion 5 (c) would not apply to the project.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Proposed Project would not alter the existing circulation conditions of the site such that a hazardous design feature would be introduced. However, once the Proposed Project is in operation, horses from the stables may be walked on the trails leading to nearby arenas (Bercut Equitation Field, Dressage Ring, Redwood Ring, and Little Speedway Ring). Currently these trails, which connect the project site to the equestrian rings nearby, are used by SFPD mounted unit, mountain bikers, joggers, and walkers. The GGP Master Plan designates multi-use trails that include equestrian uses, which connect the project site with nearby arenas. SFRPD shall implement Environmental Enhancement Measure 1 - Transportation and Circulation presented on page 97 of this document if determined necessary, which would serve to inform the different users of one another.

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[24] San Francisco County Transportation Authority. *San Francisco CMP*. 2005.

e) Result in inadequate emergency access?

The project would not change the access configuration, or site ingress/egress of the existing site. Emergency access would be via James Bloesch Road. The site would be accessible to emergency personnel and vehicles from the access road on the east side, James Bloesch Road on the north side, and the parking lot on the west side.

The City and County of San Francisco also ensures fire safety primarily through provisions of the Building Code and the Fire Code. The existing and new buildings would be required to meet standards contained in these codes. The project would conform to these standards, which may also include development of an emergency procedure manual in the event that the horses need to be evacuated. In this way, fire hazards associated with emergency access would be mitigated during the permit review process. There would be no impacts to emergency access.

f) Result in inadequate parking capacity that could not be accommodated by alternative solutions?

There are approximately 15 off street parking spaces at the project site's parking lot. The parking lot would be re-striped and all existing parking would remain. Additional parking supply is also readily available along JFK Drive on both sides of the road and at a parking lot further west past the SFPD stables, as an alternative solution. The project site would generate approximately 136 daily trips. However, parking demand generated by the Proposed Project would be dispersed throughout the day, as equestrian lessons would be offered at various times throughout the day. Parking as a result of the Proposed Project would not substantially change the parking conditions in the area. The project site may, on occasion serve as the location for small events limited to participants at the equestrian center. These events could result in an increase in traffic compared to the Proposed Project's daily operations. However, the site operator would be required to obtain a permit from the Recreation and Park Commission pursuant to Article 7 of the San Francisco Park Code for such events, which may include coordinating parking and circulation with the Department of Parking and Transportation and the SFPD as a condition of approval. Compliance with the event permit and associated conditions would reduce impacts to less than significant levels.

San Francisco does not consider parking supply as part of the permanent physical environment. Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact. (CEQA Guidelines § 15131(a).) The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular, would be in keeping with the City's "Transit First" policy. The City's Transit First Policy, established in the City's Charter Section 16.102 provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the Proposed Project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably addresses potential secondary effects.

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks) or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes?

The Proposed Project would not affect any programs, plans or policies supporting alternative transportation, such as bus turnouts or bicycle racks. The Proposed Project area is served by MUNI Routes 5-Fulton, 16-Noriega and 29-Sunset buses. Route 5 runs along Fulton Drive on the north end of GGP, while Routes 16 and 29 run along Lincoln Way on the south end of GGP. Although most trips to the project site are anticipated to be from private automobiles, the site is within a 15 minute walk from the bus routes that run along Fulton and Lincoln. The project is not anticipated to cause a substantial increase in transit demand. Impacts would be less than significant.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
6. NOISE—Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	☐
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	☐
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☐	☒
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☐	☒
g) Be substantially affected by existing noise levels?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is located entirely within GGP and is completely surrounded by park uses. Existing noise-sensitive land uses in the vicinity include residences along Fulton Street, the closest of which is approximately 1,000 feet from the project site.

The existing noise environment within the project area is influenced primarily by surface transportation noise emanating from vehicle traffic on area roadways (e.g., JKF Drive). Noise from activities that currently exist on the project site and at surrounding uses at the polo fields, SFPD stables, and park users include people talking, dogs barking, etc. The operation of landscape equipment also contributes, to a lesser extent, to the existing noise environment.

As stated above, one of the dominant noise sources in the vicinity of the project site is vehicle traffic on nearby roadways. Traffic on JFK Drive contributes the highest noise levels from this source in the project study area. Existing roadway traffic noise levels were modeled for these roadways using the Federal Highway Administration (FHWA) Traffic Noise Prediction Model, as shown in Table 5.

Table 5 presents the modeled Community Noise Equivalent and Day-Night noise levels (CNEL/ L_{dn}) at 50 feet from the centerline of the near travel lane and the distance from the roadway centerline to CNEL/ L_{dn} contours for the existing average daily traffic (ADT) volumes on John F Kennedy Drive (east of Chain of Lakes Drive) of approximately 8,800.[25]

Table 5
Summary of Modeled Existing Vehicle Traffic-Noise Levels[1]

Roadway Segment	**Distance (ft) from Roadway Centerline to CNEL/L_{dn} (dBA)**				**CNEL/L_{dn} (dBA) 50 Feet from Centerline of Near Travel Lane**
	70 CNEL	**65 CNEL**	**60 CNEL**	**55 CNEL**	
John F. Kennedy Drive (east of Chain of Lake Drive)	-	-	57.6	123.3	60.1

[1] Modeled noise levels do not consider any shielding or reflection of noise by existing structures or terrain features or noise contribution from other sources and where:

- A-weighted Decibel (dBA) is a measure on a logarithmic scale which indicates the squared ratio of sound pressure to a reference sound pressure. A-weighted (A) refers to the specific frequency-dependent rating scale that is used to approximate human response.
- Community Noise Equivalent Level (CNEL) is the energy-average of the A-weighted noise levels during a 24-hour period with 5 dBA added to the evening (7 to 10 p.m.) hours and 10 dBA to the night (10 p.m. to 7 a.m.) hours.
- Day-Night Level (L_{dn}) is the energy-average of the A-weighted noise levels during a 24-hour period with 10 dBA added to the night (10 p.m. to 7 a.m.) hours.

Source: Data Modeled by EDAW 2006

DISCUSSION

a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Short-Term Construction Source Noise

On-site Construction Equipment

Project implementation would include rehabilitation of the WPA stables; expansion, covering, and installation of retaining wall at the arena; demolition of the grandstand; construction of apartments, demolition of existing ancillary structures, and landscape improvements. Specific on-site construction equipment required for the activities mentioned above is not known at this time, but may include an excavator, front-end loader, rubber tired backhoe, grader, compactor, and trucks, based on similar projects. According to the EPA, individual equipment noise levels for these types of equipment can range from 79 to 91 dBA at 50 feet without feasible noise control, as shown in Table 6. The simultaneous operation of the on-site heavy-duty construction equipment could result in combined intermittent noise levels of approximately 94 dBA at 50 feet from the project site. Based on these noise levels and a typical noise-attenuation rate of 7.5 dBA per doubling of distance for soft sites[26], exterior noise levels at approximately 100 and 1,000 feet (i.e., the distance to the nearest sensitive receptor) could exceed 87 and 62 dBA, respectively, without noise control.

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[25] City and County of San Francisco Department of Planning (CCSFDP). *Final Transportation Study for the Golden Gate Park Draft Master Plan EIR.* 1996. Prepared by The Duffey Company.

Table 6
Typical Construction Equipment Noise Levels

	Noise Level in dBA at 50 feet	
Type of Equipment	**Without Feasible Noise Control**	**With Feasible Noise Control**[1]
Dozer or Tractor	80	75
Excavator	88	80
Scraper	88	80
Compactor	82	75
Front-end Loader	79	75
Backhoe	85	75
Grader	85	75
Crane	83	75
Truck	91	75

[1] Feasible noise control includes the use of intake mufflers, exhaust mufflers, and engine shrouds in accordance with manufacturer's specifications.

Sources: U.S. Environmental Protection Agency. *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances.* 1971; Federal Transit Administration. *Transit Noise and Vibration Impact Assessment.* 1995.

All construction activities would be required to comply with the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code). The Noise Ordinance requires that: (1) noise levels of construction equipment, other than impact tools, must not exceed 80 decibels (measured as dBA; a unit of measure for sound where "A" denotes use of the A-weighted scale, which simulates the response to the human ear to various frequencies of sound) at a distance of 100 feet from the source; (2) impact tools must have intake and exhaust mufflers that are approved by the Director of the Department of Public Works to best accomplish maximum noise reduction; and (3) if the noise from the construction work would exceed the ambient noise levels at the property line of the site by five dBA, the work must not be conducted between 8:00 p.m. and 7:00 a.m., unless the Director of the Department of Public Works authorizes a special permit for conducting the work during that period. Compliance with the Noise Ordinance is required by law and would reduce any construction noise-related impacts to a less-than-significant level.

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[26] California Department of Transportation (Caltrans). *Technical Noise Supplement.* Available: <http://www.dot.ca.gov/hq/env/noise/pub/Technical%20Noise%20Supplement.pdf>. 1998.

Off-site Construction Traffic

Construction of the proposed project would require on-site employees. The specific number of on-site employee required for the activities mentioned above is not known at this time, but would not be anticipated to be more than approximately 10 employees at any given time, based on similar projects. Assuming four total trips per day per employee and a total of 114 trips over the entire construction period associated with material removal (resulting in approximately 10 daily trips if demolition occurred over a two week period), project construction would result in a maximum of approximately 50 one-way daily trips. Typically, traffic volumes have to double before the associated increase in noise levels is noticeable [3 dBA (CNEL/L_{dn})] along roadways. Therefore, the addition of these daily trips on the local roadway system to existing volumes (e.g., 8,800 trips) would be minor. Consequently, construction of the project would not result in a noticeable change in the traffic noise contours of area roadways. Moreover, such increases in traffic would be temporary and occur during the less noise-sensitive daytime hours. Thus, short-term off-site construction traffic source noise would not result in the exposure of persons to or generation of noise levels in excess of applicable standards or create a substantial temporary increase in ambient noise levels in the project vicinity. As a result, this impact is considered less than significant and no mitigation is required.

Long-Term Operational Source Noise

On-site Stationary and Area

Long-term operation of the Proposed Project would not result in the operation of any new noise-generating stationary equipment. In addition, area source noise (e.g., people talking and landscape maintenance activities) from the long-term operation of the project use would not be substantially different as a result of the project than it is currently. In addition, as noted above, the closest existing receptor is approximately 1,000 feet from the project site. Based on a typical noise attenuation rate, resultant noise levels would be substantially reduced (e.g., less than 40 dBA) at this distance. Thus, long-term on-site stationary- and area-source noise would not result change substantially from existing conditions and would not result in the exposure of persons to or generation of noise levels in excess of applicable standards or create a substantial permanent increase in ambient noise levels in the project vicinity. As a result, this impact is considered less than significant and no mitigation is required.

Off-site Operational Traffic

Long-term operation of the project would result in approximately 136 daily trips distributed on the local roadway system and dispersed throughout the day. Typically, traffic volumes have to double before the associated increase in noise levels is noticeable [3 dBA (CNEL/L_{dn})] along roadways. Therefore, the addition of these daily trips on the local roadway system to existing volumes would be minor. Consequently, operation of the project would not result in a noticeable change in the traffic noise contours of area roadways. The proposed location of the site caretaker and stewards' quarters and class room buildings would not be near any major traffic, stationary, or area sources.[27] Therefore, on-site noise levels would not be anticipated to exceed the applicable land use compatibility standards (i.e., 60 and 65 Ldn/CNEL for exterior and 45 Ldn/CNEL for interior), especially considering the noise reduction from common building construction provides a minimum exterior-to-interior reduction of 25 dBA.[28] Title 24 of the California Code of Regulations establishes uniform noise insulation standards for residential projects. The Department of Building Inspection would review the final building plans to ensure that the building wall and floor/ceiling assemblies meet State standards regarding sound transmission. Thus, long-term off-site operational traffic source noise would not result in the exposure of persons to or generation of noise levels in excess of applicable standards or create a substantial permanent increase in ambient noise levels in the project vicinity. As a result, this impact would be considered less than significant and no mitigation is required.

b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction activities have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and operations involved. Vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Table 7 displays vibration levels for typical construction equipment.

As discussed above, the on-site construction equipment required for the activities mentioned above is not known at this time, but would likely include an excavator, front-end loader, rubber tired backhoe, grader, compactor, paving machine, and trucks, based on similar projects. According to Federal Transit Administration (FTA), vibration levels associated with the use trucks is 0.076 inches per second (in/sec) peak particle velocity (PPV) and 86 vibration decibels [VdB referenced to 1 microinch per second (μin/sec) and based on the root mean square (RMS) velocity amplitude] 25 feet, as shown in Table 7. Based on these values, worst-case vibration levels would not exceed Caltrans's recommended standards of 0.2 and 0.08 in/sec PPV[29] with respect to the prevention of structural damage for normal and historical buildings, respectively, or FTA's maximum-acceptable vibration standard of 80 VdB[30] with respect to human annoyance for residential uses.

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[27] The proposed caretaker, steward, and classroom buildings are 350 feet from JFK Drive for which modeled levels would be well under 55 Ldn/CNEL as shown in Table 5 not even accounting for the intervening structures.

[28] Paul S. Veneklasen & Associates. *Noise Insulation Problems in Buildings.* 1973. As cited in Caltrans. *California Airport Land Use Handbook.* 2002. Available at www.dot.ca.gov/hq/planning/aeronaut/htmlfile/landuse.html.

The long-term operation of the proposed project would not include any vibration sources. Thus, short-term construction would not result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. As a result, this impact is considered less than significant and no mitigation is required.

Table 7
Typical Construction-Equipment Vibration Levels

Equipment	**PPV at 25 feet (in/sec)[1]**	**Approximate L_v at 25 feet[2]**
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

[1] Where PPV is the peak particle velocity
[2] Where L_v is the velocity level in decibels (VdB) referenced to 1 μinch/second and based on the root mean square (RMS) velocity amplitude.
Source: Federal Transit Administration. *Transit Noise and Vibration Impact Assessment.* 1995.

c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

As discussed in a) above, long-term on-site stationary or area; or off-site operational traffic source noise would not result in the exposure of persons to or generation of noise levels in excess of applicable standards or create a substantial permanent increase in ambient noise levels in the project vicinity. As a result, this impact would be considered less than significant and no mitigation is required.

d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

As discussed in a) above, short-term on-site construction equipment source noise would not result in the exposure of persons to or generation of noise levels in excess of applicable standards or create a substantial temporary increase in ambient noise levels in the project vicinity. As a result, this impact is considered less than significant and no mitigation is required.

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[29] Caltrans. *Transportation Related Earthborne Vibrations.* 2002.

[30] Federal Transmit Administration (FTA). *Transit Noise and Vibration Impact Assessment.* 1995.

e, f) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and for a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

The project site is not located within 2 miles of a public or private airport and would not expose people residing or working in the project area to excessive noise levels. No impacts would occur.

g) **Be substantially affected by existing noise levels?**

As described in the environmental setting, the existing noise environment consists of noise from vehicles on nearby roads and activities that currently exist at the surrounding uses at the polo fields, SFPD stables, and park. Noise includes people talking, dogs barking, and operation of park maintenance equipment. The proposed equestrian center would not be a noise sensitive use of the site. Loud startling noise could upset some horses, but such sources of noise are not present in the near vicinity of the project site. Existing noise levels are not substantial and would not impact the project site.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
7. **AIR QUALITY** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. **Would the project:**					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☒	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☒	☐	☐	☐

ENVIRONMENTAL SETTING

The project site is located in the City and County of San Francisco, which lies in the San Francisco Bay Area Air Basin (SFBAAB) and is under the jurisdiction of Bay Area Air Quality Management District (BAAQMD). With respect to ozone, the City and County of San Francisco is currently designated as a nonattainment area for the state 1-hour (serious) and national 8-hour (marginal) ambient air quality standards, respectively.[31] The City and County of San Francisco is also designated as a nonattainment area with respect to the state PM_{10} and $PM_{2.5}$ standards (i.e., respirable particulate matter with an aerodynamic diameter of 10 and 2.5 micrometers or less).[32] For all other state and national ambient air quality standards, the City and County of San Francisco is designated as an attainment and/or unclassified area.

Air quality within the City and County of San Francisco is regulated by such agencies as the U.S. Environmental Protection Agency (EPA), and California Air Resources Board (ARB) at the federal and state levels, respectively, and locally by the BAAQMD. BAAQMD attains and maintains air quality conditions in the City and County of San Francisco through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air-quality issues. The clean air strategy of BAAQMD includes the preparation of plans and programs for the attainment of ambient air quality standards, adoption and enforcement of rules and regulations, and issuance of permits for stationary sources. BAAQMD also inspects stationary sources, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by the federal Clean Air Act (CAA), federal Clean Air Act Amendments of 1990 (CAAA), and the California Clean Air Act (CCAA).

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[31] California Air Resource Board (ARB). Area Designation Maps / State and National. Available at www.arb.ca.gov/desig/adm/adm.htm#state. Accessed August 2006. U.S. Environmental Protection Agency (EPA). Criteria Air Pollutant Information and Attainment Designations. Available at http://www.epa.gov. Accessed August 2006.

[32] ARB. *Area Designation Maps / State and National.* Available at www.arb.ca.gov/desig/adm/adm.htm#state. Accessed August 2006.

DISCUSSION

a) Conflict with or obstruct implementation of the applicable air quality plan?

In an effort to reach attainment of the state and national ozone standards, the BAAQMD prepared the Bay Area 2000 Clean Air Plan (CAP) and the 2001 Ozone Attainment Plan (OAP). More recently, the BAAQMD, in cooperation with the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG), has prepared the Bay Area 2005 Ozone Strategy. The Ozone Strategy is a plan showing how the SFBAAB will achieve compliance with the state 1-hour ambient air quality standard for ozone as expeditiously as practicable and how the region will reduce transport of ozone and ozone precursors to neighboring air basins.[33]

The State Implementation Plan is a broad-level air quality plan based on the population growth levels and distribution identified in the local plans combined with the cumulative impacts from approved and proposed development projects. Proposed projects that increase population or employment growth beyond that identified in the local plans may increase vehicle miles traveled, leading to an increase in mobile-source emissions, which likely may conflict with the BAAQMD's air quality planning efforts. Consequently, an increase in vehicle miles traveled beyond projections in local plans could result in a significant adverse incremental effect on the region's ability to attain or maintain state and national ambient air quality standards.

According to the BAAQMD, any project within an approved general plan area that is consistent with the land use designations and development assumptions contained in the general plan would not conflict with or obstruct implementation of the State Implementation Plan.[34] Because the Proposed Project is anticipated to be operated exclusively within the existing and approved Golden Gate Master Plan and would not require any amendments to the existing local land use designations and zoning, it is in compliance with the State Implementation Plan. Thus, the BAAQMD specifically considers that implementation of the Proposed Project would not be anticipated to increase population or vehicle miles traveled beyond that already assumed and approved for development and accounted for in the emissions budgets contained in the State Implementation Plan and likewise with the CAO, OAP, and Ozone Strategy. In addition, implementation of the Proposed Project is not anticipated to result in the operation of any major stationary emission source. Thus, implementation of the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan. As a result, this impact is considered less than significant and no mitigation is required.

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[33] Bay Area Air Quality Management District (BAAQMD). *Planning Information.* Available at: http://www.baaqmd.gov/pln/plans/index.htm.2006. Accessed August 2006.

[34] BAAQMD. CEQA Guidelines. 1999.

b) **Violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

Short-Term Construction-Generated Emissions

Construction emissions are described as "short-term" or temporary in duration and have the potential to represent a significant impact with respect to air quality. Reactive Organic Gases (ROG) and Nitrogen Oxide (NO_X) emissions are primarily associated with gas and diesel equipment exhaust and the application of architectural coatings. Fugitive PM_{10} dust emissions are primarily associated with site preparation and vary as a function of such parameters as soil silt content, soil moisture, wind speed, acreage of disturbance area, and Vehicle Miles Traveled (VMT) by construction vehicles on- and off-site. With respect to the project, proposed actions (refer to Table 1) at the WPA stables (e.g., upgrade and rehabilitation), arena (e.g., expansion, covering, and installation of retaining wall), grandstand (e.g., demolition), and others (e.g., construction of apartments, demolition of existing ancillary structures, and landscape improvements) would result in the temporary generation of ROG, NO_X, and PM_{10} emissions from site preparation (e.g., demolition, excavation, grading, and clearing); off-road equipment, material import/export, and worker commute exhaust emissions; paving; application of architectural coatings; and other miscellaneous activities.

According to the BAAQMD, PM_{10} is the pollutant of greatest concern with respect to construction-generated emissions. While off-road equipment, material delivery, and worker commute result in Carbon Monoxide (CO) and ozone precursor emissions (e.g., ROG and NOx), such are included in the emissions inventory, which serves as the basis for the air quality plans, and are not expected to impede attainment of ozone or maintenance of CO standards in the SFBAAB. This is why the BAAQMD has no mass emission thresholds for construction emissions of ROG and NOx and bases its determination of significance for construction emissions on consideration of the dust control measures to be implemented.[35]

Consequently, BAAQMD's approach to CEQA analyses of construction-generated fugitive PM_{10} dust emissions is to require implementation of effective and comprehensive control measures rather than a detailed quantification of construction emissions. The BAAQMD requires that all feasible control measures, which are dependent on the size of the construction area and the nature of the construction activities involved, shall incorporated into project design or implemented during project construction.

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[35] BAAQMD. 1999

Because BAAQMD-recommended mitigation measures are not currently incorporated into the Proposed Project, temporary construction emissions could violate or contribute substantially to an existing or projected air quality violation, especially considering the County's nonattainment status for PM_{10}. As a result, this impact is considered potentially significant. Implementation of Mitigation Measure 2 - Air Quality presented on page 96 of this document would reduce short-term construction-generated emissions to a less than significant level.

The project is also subject to Ordinance 175-91, which was passed by the Board of Supervisors on May 6, 1991. This Ordinance requires that non-potable water be used for dust control activities. Therefore, the project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose. The project sponsors would require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

Long-term Operational Emissions

As discussed in Section E, Topic 5, Transportation and Circulation, the long-term operation of the Proposed Project would result in approximately 136 daily trips (in and out). The BAAQMD does not require the quantification of long-term regional emissions for projects that result in the generation of less than 2,000 daily trips, as related emissions of ROG, NO_X, and PM_{10} would not exceed BAAQMD's recommended thresholds [80 pounds per day (lb/day), 15 tons per year (tpy)]. Also, project implementation would not be anticipated to result in or contribute to local mobile-source CO concentrations that exceed the California 1-hour ambient air quality standard of 20 parts per million (ppm) or the 8-hour standard of 9 ppm, because of the negligible amount of project-generated trips which would not affect (e.g., degrade intersection level of service) congestion on the local roadway system.

Furthermore, project implementation would not result in the operation of any new major stationary emission sources. Area source emissions associated with landscaping activities would occur at a level similar to existing conditions. Thus, long-term operational emissions would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. As a result, this impact is considered less than significant and no mitigation is required.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

As discussed in b) above, project implementation would not result in long-term operational ROG, NO_X, PM_{10}, or CO emissions that would result in or contribute substantially to an air quality violation. During construction, air quality could potentially be affected for short periods. The demolition of the existing structures, and the movement of soils to excavate the foundation and grade the project site, while minimal, would create fugitive dust and emit criteria pollutants as a result of diesel fuel combustion. The criteria pollutants or precursors to criteria pollutants are: nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO_2), hydrocarbons (HC), and particulate matter with a diameter of less than 10 microns (PM_{10}). Fugitive dust is made up of particulate matter including PM_{10}.

While construction emissions would occur in short-term, temporary phases, they could cause adverse effects on local air quality. The BAAQMD, in its CEQA Guidelines, has developed an analytical approach that obviates the need to quantitatively estimate these emissions. The BAAQMD has also identified a set of feasible PM_{10} control measures for construction activities. There is no pile driving anticipated, and dust-generating activities resulting from site preparation and construction would be mitigated with water spray and covered truck hauling. SFRPD has agreed to implement Mitigation Measure 2 - Air Quality presented on page 96 of this document. With implementation of this mitigation measure, construction air quality impacts would be reduced to a less than significant level.

The BAAQMD neither recommends quantified analysis of cumulative construction emissions nor provides thresholds of significance that could be used to assess cumulative construction impacts. The construction industry, in general, is an existing source of emissions within the Bay Area. Construction equipment operates at one site on a short-term basis and, when finished, moves on to a new construction site. Because construction activities would be temporary, the contribution to the cumulative context is so small as to be virtually immeasurable, and all of the appropriate and feasible construction-related measures recommended by the BAAQMD would be implemented (see Mitigation Measure 2 - Air Quality on page 96.), the contribution of construction emissions associated with the Proposed Project would not be cumulatively considerable.

d) Expose sensitive receptors to substantial pollutant concentrations?

Criteria Air Pollutant and Precursor Emissions (ROG, NO_X, PM_{10}, and CO)

As discussed in b) and c) above, project implementation would not result in long-term operational ROG, NO_X, PM_{10}, or local CO emissions that would result in or contribute substantially to an air quality violation. However, air quality could potentially be impaired by emissions and particulate matter for short periods during construction. Thus, construction-generated PM_{10} emissions, while short-term, could expose receptors to substantial pollutant concentrations. As a result, this impact is considered potentially significant. Implementation of Mitigation Measure 2 - Air Quality, as described above, would reduce short-term construction-generated emissions to a less than significant level.

Toxic Air Contaminant Emissions

Construction of the Proposed Project would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Diesel Particulate Matter (PM) was identified as a Toxic Air Contaminant (TAC) by the ARB in 1998. Construction of the Proposed Project would result in the generation of diesel PM emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities. According to the ARB, the potential cancer risk from the inhalation of diesel PM, as discussed below, outweighs the potential non-cancer health impacts.

It is important to note that construction equipment emissions will be reduced over the period of project development. In January 2001, the EPA promulgated a Final Rule to reduce emission standards for 2007 and subsequent model year heavy-duty diesel engines. These emission standards represent a 90 percent reduction in NOx, a 72 percent reduction of non-methane hydrocarbon (NMHC) emissions, and a 90 percent reduction of PM emissions in comparison to the 2004 model year emission standards. In December 2004, the ARB adopted a fourth phase of emission standards (Tier 4) in the Clean Air Non-road Diesel Rule that are nearly identical to those finalized by EPA on May 11, 2004. As such, engine manufacturers are now required to meet after treatment-based exhaust standards for NOx and PM starting in 2011 that are over 90 percent lower than current levels, putting emissions from off-road engines virtually on par with those from on-road heavy-duty diesel engines.

More specifically, the dose to which receptors are exposed is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health

Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project.[36] Thus, because the use of off-road construction equipment would be temporary in combination with the highly dispersive properties of diesel PM[37], future reductions in exhaust emissions, and the small scale of the proposed construction-related activities (i.e., no excessive truck travel and only 2 acres in size, short-term construction activities would not result expose sensitive receptors to substantial TAC emissions. Please also see the Hazards and Hazardous Materials discussion, Topic 15, on page 84.

In addition, before any demolition or renovation activities occur, an asbestos clearance must be obtained from the BAAQMD, and the project must comply with 40 CFR Section 61 Subpart M for National Emissions Standards for Hazardous Air Pollutants (NESHAP) for asbestos and BAAQMD Rule 11-2. This would ensure that no improper handling of asbestos would occur during the proposed demolition activities. Furthermore, project implementation would not result in the operation of any new major stationary emission sources of TACs.

Thus, short-term construction and long-term operational sources would not expose sensitive receptors to substantial TAC concentrations, especially because there are no surrounding sensitive receptors in the project vicinity. As a result, this impact is considered less than significant and no mitigation is required.

e) Create objectionable odors affecting a substantial number of people?

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. Although offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies.

The BAAQMD has established Rule 7 (Odorous Substances) that specifically addresses citizen complaints. Project implementation would not result in any major sources of odor and the project type is not one of the common types of facilities that are known to produce odors (e.g., landfill, coffee roaster, wastewater treatment). In addition, the diesel exhaust from the use of on-site construction equipment would be intermittent and temporary, and would dissipate rapidly from the source with an increase in distance. Finally, as previously noted, there are no surrounding sensitive receptors in the project vicinity. However, operation of the project could result in minor sources of odors if manure and stable refuse is not properly removed and disposed of. Thus, project implementation could create objectionable odors affecting a substantial number of people. As a result, this impact is considered potentially significant. Implementation of Mitigation Measures 3 - Air Quality presented on page 96 of this document would reduce project-related odors to a less than significant level.

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[36] Salinas, Julio. Staff Toxicologist. Office of Health Hazard Assessment, Sacramento, CA. Telephone conversation with Kurt Legleiter of EDAW regarding exposure period for determining heath risk. August 3, 2004.

[37] Zhu, Yifang, W. C. Hinds, S. Kim, and S. Shen. *Study of Ultrafine Particles Near a Major Highway with Heavy-duty Diesel Traffic.* Atmospheric Environment 36:4323-4335. 2002.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
8. **WIND AND SHADOW—Would the project:**					
a) Alter wind in a manner that substantially affects public areas?	☐	☐	☒	☐	☐
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	☐	☐	☒	☐	☐

ENVIRONMENTAL SETTING

The prevailing winds in San Francisco generally come from the west from the Pacific Ocean. Wind flow and interception patterns through a site are generally determined by the arrangement of buildings and surrounding landscape. The forests were planted in GGP primarily on the slopes and hills to provide shelter from winds for the meadows that were located in the valleys.[38] Currently the massing of the WPA stables, adjacent SFPD stables and landscaping, and forest area catch the prevailing wind from the west.

DISCUSSION

a) Alter wind in a manner that substantially affects public areas?

Wind impacts can be caused by buildings oriented such that a large wall or massing of buildings catches a prevailing wind and directs it to where public uses are present. The forest area along to the west of the project area, adjacent SFPD stables and landscaping, and existing buildings currently serve to catch the wind flow through the site. The project's covered arena and new stables would catch the wind from the west. The structures are not sufficiently tall or bulky to result in a substantial diversion of wind at the site. Although the final design and materials of the arena and new stables are yet to be determined, articulation along the exteriors of the new structures would further serve to catch the prevailing wind. The construction of the covered arena would result in the removal of one eucalyptus tree that is located on the east side of the existing grandstand structure. Removal of this tree would not result in a substantial altering the wind pattern through the site. The area to the east and downwind of the site is at a slightly lower elevation than the project site, is a forested area, and sheltered from the wind. Wind would not be altered such that the site and adjacent areas are substantially affected as a result of the Proposed Project. Impacts would be less than significant.

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[38] SFRPD. 1998.

b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?

The project includes the construction of a covered arena, which would be the tallest structure within the site and would add new shade to portions of the site. The Park is under the jurisdiction of the Recreation and Park Commission and subject to Section 295 of the Planning Code. This section of the Planning Code prohibits new shadow on City parks. However, Section 295 does not apply to buildings less than forty feet tall nor to buildings constructed on park property for recreational or park-related purposes. Because the project is: on park property, is for recreational purposes, and the new arena would be under forty feet tall, Section 295 is not applicable to the project. Shadows cast by the new structure proposed for construction would be similar to that cast by existing structures and would not adversely affect the use of public spaces or facilities. Impacts would be less than significant.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
9. RECREATION—Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☐	☒	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐	☐
c) Physically degrade existing recreational resources?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project is located within GGP, which is a major local and regional recreation area and attraction. The park attracts between 11 and 15 million visits per year, of which it is estimated that half of the visits are from San Francisco residents, one quarter from Bay Area residents, and one quarter from people beyond the Bay Area.[39] Equestrian uses within GGP is a historic activity evidenced by the numerous designated bridle trails in the park and in other park features such as the Speedway Meadow, which takes its name from an area that was designated for fast riding, the Polo Field, riding arenas, and the GGP Equestrian Center.

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[39] SFRPD. 1998.

DISCUSSION

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The project would reestablish a previous use of the site and would result in increased use of the property for equestrian purposes. However, the increased use of the project site would not result in a substantial physical deterioration of GGP. The project components would result in the improvement of the physical condition of the facilities and site by: rehabilitating the WPA stables; constructing a new and larger arena; demolition of the dilapidated ancillary structures which would be replaced with new stables; and improvements to the pathways and parking lot. It would also provide an additional recreational facility for use within GGP. Increased trips to GGP associated with the project site would not result in substantial physical deterioration of the Park. Incremental demand on GGP facilities would be minimal and impacts would be less than significant.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

The project is a recreational facility in GGP that would improve the condition and reestablish a previous use of the site. Potential impacts from the construction and implementation of the project are evaluated in this initial study. No additional impacts would occur from the construction of the project's recreational facilities.

c) Physically degrade existing recreational resources?

As mentioned in a) above, construction and implementation of the project would improve the facilities and site condition and would not result in the substantial degradation of existing recreational resources. Potential trail erosion from horse use between the project site and nearby arenas is addressed in Section E, Topic 13.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
10. UTILITIES AND SERVICE SYSTEMS—Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	☐	☐	☒	☐	☐
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The sewer system in GGP has been in existence since the 1930's and collects the sanitary and storm flow generated within GGP by sanitary sewer lines and catch basins. The stormwater drainage system in GGP includes approximately 230 catchbasins. Catchbasins are typically 5 to 6 feet deep and currently connect to French drains, which are containers that allow water to percolate into the ground and return water to the aquifer below.[40] The sewer lines are both gravity and forced-main types, which flow into the City of San Francisco's combined sewer (handles sewer and stormwater drainage) systems. The flow is conveyed to the Oceanside Water Pollution Control Plant where it is treated and discharged into the Pacific Ocean.

GGP has undergone a series of utilities infrastructure upgrades in the last few years as part of the 1992 Golden Gate Park Infrastructure Bond to address problems as a result of the old infrastructure.[41] The infrastructure supporting the project site was upgraded in 2002 as part of the 1992 Golden Gate Park Infrastructure Bond and is served by a combined sewer and drainage system, which discharges into a larger combined sewer system on 38th Avenue and Fulton Street. The site is also served by an existing water supply line.

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[40] City and County of San Francisco Planning Department. *Golden Gate Park Draft Master Plan Final EIR.* 1997.

[41] City and County of San Francisco Bureau of Engineering Department of Public Works. *Contract Areas 17, 24, 28, 41 and 42 Martin Luther King, Jr. Drive Utilities.* 2001.

Irrigation water supply within GGP comes from groundwater, while potable water from the San Francisco Water Department (SFWD) supplies the rest of the balance. The majority of water use in GGP is for landscape irrigation and replenishment of lake water (CCSF 1997). The San Francisco Water Department (SFWD) water comes from the Hetch Hetchy system, operated by the San Francisco Public Utilities Commission (SFPUC).

San Francisco's solid waste is taken to Altamont Landfill in Alameda County, which consists of two units. Unit 1 is a Class II and III landfill facility that accepts ash, construction/demolition, contaminated soil, green materials, industrial, mixed municipal, other designated, tires, and shreds. Unit 2 is an ACW Disposal Site that accepts asbestos and friable materials. At present, the project site is presumed to have minimal sewage and solid waste generation given the lack of use. The adjacent SFPD Stables and North Polo Field restrooms are the nearby uses that currently generate sewage and solid waste in the area and served by existing infrastructure.

DISCUSSION

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Given the anticipated low sewage generation for the project, no new wastewater facilities construction would be needed to serve the project site. The project site would generate approximately 365 gallons of sewage per day.[42] Approximately another 2,700 to 3,600 gallons of water per day may be used for washing horses and stables wash down, which would enter the wastewater system.[43] The Proposed Project would meet wastewater pre-treatment of the San Francisco Public Utilities Commission, as required by the San Francisco Industrial Waste Ordinance.[44] The horse manure would not go into the sewage system, as it would be temporarily stored in the manure bunker onsite and trucked to the composting area, which is located within GGP. However, rainfall and stormwater runoff that comes into contact with manure may be a potentially significant impact to water quality. Although the drains are connected to the combined sewer system, Mitigation Measure 3 – Air Quality shall be implemented, which requires manure management. In addition, SFDRP shall implement Mitigation Measure 4 –

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[42] Assuming 80 gallons water per day (gpd) per household (Source: Mike Brown, SFPUC, Financial Planning). Caretaker and steward units would have water demand of 160 gpd. 0.9 flow factor x 160 gpd = 144 gpd wastewater. Assumption for other uses including restroom use and hand washing by employees and equestrian students at approximately 221 gpd.

[43] Assuming water use at 15 gpm and at 180 to 240 minutes of daily use, this totals 2,700 to 3,600 gpd. Therefore this presents a conservative estimate. Water use for horse washing and stables wash down would occur throughout the day, rather than all at once. Horses would not be washed daily.

[44] City and County of San Francisco. San Francisco Municipal Code (Public Works), Ordinance No. 19-92, Part II, Chapter X, Article 4.1 (amended). January 13, 1992.

Hydrology and Water Quality, presented on page 96 of this document to reduce potential water quality impacts to less than significant levels. Wastewater from GGP ultimately goes to the Oceanside Water Pollution Control plant, which treats stormwater and sewer flows from the western half of the City of San Francisco. The Oceanside Water Pollution Control Plan treats an average daily flow of 17 million gallons per day (mgd), with a total capacity of 65 mgd during peak weather flows.[45] It treats approximately 60 mgd during peak weather from the west side of the City. The plant would have sufficient capacity to receive all flows from the project site. Sewage generated by the caretaker and stewards' units at the site would be a fractional amount of sewage generated by the GGP as a whole and surrounding area.

A small change in impermeable surface would result from the project and would not result in the need to install new catch basins in GGP. New drainage inlets would be installed around new buildings to accommodate drainage from these structures.[46] The Proposed Project would have minimal effect on the total drainage volume discharged since the majority of the site is already developed. There would not be a substantial increase in wastewater treatment demand as a result of the Proposed Project. Impacts would be less than significant.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

As discussed in the Environmental Setting and a) above, the project site is already served by exiting water and wastewater systems that were upgraded as part of the 1992 Golden Gate Park Infrastructure Bond. The system will accommodate the Proposed Project's flows and no new water or wastewater facilities or expansion of existing facilities would be required as a result. Impacts would be less than significant.

c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

As discussed in the Environmental Setting and a) above, the project site is already served by the existing stormwater and collection system that was upgraded as part of the 1992 Golden Gate Park Infrastructure Bond. The system will accommodate the Proposed Project's flows and no new facilities or expansion of existing facilities would be required as a result. Impacts would be less than significant.

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[45] San Francisco Public Utilities Commission. *Treatment Plants.* Available at http://sfwater.org/mto_main.cfm/MC_ID/14/MSC_ID/117/MTO_ID/225. Accessed August 2006.

[46] Specific drainage inlet locations would be determined at the time of construction design.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Water would be required during the construction and demolition phases of the Proposed Project for dust suppression purposes. The project sponsor would require the contractor(s) pursuant to Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991 to use non-potable water for dust control activities. The contractor(s) would be required to obtain reclaimed water from the Clean Water Program. Groundwater from an existing well could be used for the construction phase. Therefore water demand for construction and demolition activities would be negligible.

The project would generate a demand for water of approximately 5,000 to 6,000 gallons per day primarily for domestic water supply, watering of horses, wash down of horse stables and activity areas, and other uses.[47] Landscaping at the site would be improved and would continue to be watered by the existing irrigation system. The project site is within the Golden Gate Park Reclaimed Water Use Area designated by Section 1209 of the Reclaimed Water Use Ordinance (approved November 7, 1991), which added Article 22 to Park II, Chapter X of the San Francisco Municipal Code (Public Works Code). This ordinance applies to non-residential projects over 40,000 square feet which require a site permit, building permit, or other authorization, and are located within this area to provide for the construction and operation of a reclaimed water system for the transmission of reclaimed water within buildings and structures. Because the Proposed Project's new non-residential construction and modifications are less than 40,000 square feet[48], a reclaimed water system would not be required to serve the site. The water supply source for GGP is a combination of groundwater and potable water. The SFPUC's *2005 Urban Water Management Plan for the City and County of San Francisco* estimates approximately 2.5 million gallons per day (mgd) are produced by the groundwater wells in GGP and San Francisco Zoo. This basin is not identified as overdrafted, nor is it projected to be overdrafted in the future (SFPUC 2005).

The Proposed Project water use is expected to be approximately 5,000 to 6,000 gallons per day (gpd). This demand represents less than 1 percent of the 2.5 mgd used by GGP and the San Francisco Zoo. The project would incrementally increase the demand for water in San Francisco. Sufficient water supply would be available to serve the project site when it is in operation.[49] The new construction would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the California State Building Code Section 402.0(c). The projected water consumption for the proposed project was assumed in the San Francisco Public Utilities Commission's 2005 Urban Water Management Plan and an adequate water supply would be available for the project. Since the project would have sufficient water supply available from existing entitlements, it would result in a less-than-significant project-specific and cumulative water impact.

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[47] Assuming 80 gallons water per day (gpd) per household (Source: Mike Brown, SFPUC, Financial Planning). Caretaker and steward units would have water demand of 160 gpd. Assumption for other uses including restroom use and hand washing by employees and equestrian students at approximately 221 gpd. Water use for horse washing and stables wash down: assuming water use at 15 gpm and at 180 to 240 minutes of daily use (throughout the day), totals 2,700 to 3,600 gpd. Horses would consume approximately 25 gpd of water per horse. Arena water down would be approximately 840 gpd. Water demand estimate is available for public review by appointment as part of Case File No. 2004.1094E at the Planning Department, 1660 Mission Street, Suite 500, San Francisco.

[48] New arena: 15,860 square feet, New Stables: 4,000 square feet, New Hay Barn/Feed Storage: 1,600 square feet, New Manure Bunker: 200 square feet, Modifications to WPA Stables: approx 7,000 square feet. Total square feet of new construction and modifications to existing buildings: 28,660 square feet.

[49] Manisha Kothari, Water Resources Planning, SFPUC. Personal communication. November 2006.

e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?

As discussed in a) above, the project site is served by a combined sewer system that was part of an infrastructure upgrade in the past few years. Sewage generated by the caretaker and stewards' units at the site would be a fractional amount of sewage generated by the GGP as a whole and surrounding area. The Proposed Project would have minimal effect on the total drainage volume discharged since the majority of the site is already developed. Impacts would be less than significant.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Solid waste from San Francisco is disposed at Altamont Landfill in Alameda County. The solid waste generated by the Proposed Project's construction and operation would not affect the projected life of the Altamont Landfill. An expansion of the landfill was approved in 1997. Its remaining capacity is 124,400,000 cubic feet with a maximum permitted throughput at 6,000 tons per day. The demolition of the ancillary structures and grandstand would require a demolition permit from the City and County of San Francisco. Because the Proposed Project would generate more than one (1) cubic yard of construction and demolition material, a Demolition Debris Recovery Plan would be required for the project pursuant to the City and County of San Francisco Ordinance No. 27-06 at the time of the demolition permit application. This ordinance requires that a minimum of 65% of material generated from construction, demolition, or remodeling projects to be diverted from the landfill that is, recycled. The diversion of materials would significantly reduce the amount of construction and demolition materials taken to the landfill from the project. The eucalyptus tree that is currently adjacent to the east end of the grandstand structure is proposed for removal. Wood waste as a result of the tree removal would be collected and stored in GGP's log storage area in the western end of GGP. With the preparation and implementation of a Demolition Debris Recovery Plan and straw manure composted within GGP, solid waste generated would be decreased and would not substantially affect the life of Altamont Landfill.

During project operation, non-hazardous solid waste consisting of straw manure would be generated by the horses as a result of the project's operation. The straw manure will be collected and composted at the composting site in GGP to help create and enrich a topsoil layer over the former sand dunes. The composting site is a 3.3-acre area located southwest of the Traverse Drive and JFK Drive intersection. In the past, this site took in manure from the bison paddocks, SFPD stables, and the previous operation of the GGP Equestrian Center. This site currently takes in manure from the bison paddocks and SFPD stables, and is anticipated to have sufficient capacity to compost the manure from the project's operation.[50] The straw manure collection and composting and wood storage would reduce the amount of solid waste taken to the landfill for disposal. Solid waste generated as a result of the project's operations is not anticipated to be significant. Solid waste generated would consist of litter, which would be disposed of in trash receptacles at the site. Trash would be collected on a daily basis as the rest of the GGP areas. Impacts would be less than significant.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

The project would require to comply with federal, state, and local statutes and regulations related to solid waste. Therefore no impact would occur.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
11. PUBLIC SERVICES— Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	☐	☐	☒	☐	☐

ENVIRONMENTAL SETTING

GGP and the project site are served by the City and County of San Francisco Fire and Police Departments. The San Francisco Police Department (SFPD) has several stations in the project vicinity. The Richmond Station is located on 6th Avenue between Geary Boulevard and Anza Street. The Park Station is located at 1899 Waller Street, adjacent to Kezar Stadium in the eastern end of Golden Gate Park. The SFPD Police Stables are located immediately to the west of the project site.

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[50] Hart, Tom. SFDRP. November 2006.

The San Francisco Fire Department (SFFD) Stations identified for first response to an emergency in GGP include #14 located at 26th Avenue and Anza Street, #22 located at 16th Avenue and Irving Street, #23 located at 45th Avenue between Irving and Judah Streets, #31 between 12th Avenue and Geary Boulevard, and #34 at 41st Avenue and Geary Boulevard.[51]

GGP is owned and operated by the City and County of San Francisco Recreation and Park Department and is provided for public access and recreation. There are no San Francisco Unified School District schools located within GGP.

DISCUSSION

a) **Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?**

The construction and implementation of the project would not require new or altered government facilities. The site is within the existing service area and jurisdiction of both the SFPD and SFFD. The project site is located in a low crime area.[52] The project could increase use of the site and therefore increase the number of calls received from the area for emergency response. It would be negligible in comparison to existing police and fire protection demand in the GGP area. The caretaker and steward units proposed for this site would also provide additional security during off-hours, and would assist by calling Park security, police, and the fire department. The perimeter fencing would prevent intruders from entering the site during off-hours.

The project would not induce growth nor affect the population of the area such that additional school and recreational facilities would be needed. Impacts to public services would be less than significant.

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[51] City and County of San Francisco Planning Department. *Golden Gate Park Master Plan EIR.* 1998.

[52] CrimeMAPS. Available at http://www.sfgov.org/site/police_index.asp?id=23813. No crimes within ¼ mile vicinity of the project site reported in last 90 days. Site accessed August 2006.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
12. **BIOLOGICAL RESOURCES— Would the project:**					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The biological resources investigation for the project site is based on a review of literature and databases pertinent to the resources found on the project site as well as a reconnaissance-level field survey by a biologist on August 7, 2006.[53] The purpose of the survey was to characterize the general biological resources and determine the potential for sensitive biological resources to occur on the project site.

The site consists of a highly altered environment of structures, roads, and landscaped areas. The park setting immediately surrounding the site is characterized by a mixture of landscaped trees, shrubs, herbaceous plants, and lawns, as well as paved pathways, parking lots, and roadways. Residential development and busy streets closely border GGP to the north and south.

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[53] EDAW. *Biology Field Notes*. August 2006.

A number of tall trees border the site and include blue gum (*Eucalyptus globulus*), Monterey pine (*Pinus radiata*), and Monterey cypress (*Cupressus macrocarpa*). Two smaller ornamental plum trees (*Prunus* sp.) are present at the base of the slope on the east side of the site. Several acacia trees (*Acacia sp.*) line a paved pathway on the south side of the site behind the grandstands, and a few ornamental trees (*Pittosporum* sp.) are located among the buildings. Shrubs at the site are few and mainly limited to introduced varieties, including pride of Madeira (*Echium candicans*), Ngaio tree (*Myoporum laetum*), and New Zealand nightshade (*Solanum aviculare*), but sprouts of a native species, Coyote brush (*Bachharis pilularis*), were observed on the east side of the site. At the time of the field survey, most of the herbaceous plants on the site were dead, possibly from herbicide spraying to control the weeds. The herbaceous vegetation still growing or identifiable from the dried remains was dominated by introduced and ruderal species, including pigweed (*Amaranthus* sp.), wild oats (*Avena fatua*), ripgut brome (*Bromus diandrus*), softchess brome (*Bromus hordeaceus*), Italian thistle (*Carduus pycnocephalus*), poison hemlock (*Conium maculatum*), horseweed (*Conzya canadensis*), cudweed (*Gnaphalium* sp.), licorice plant (*Helichrysum petiolare*), evening primrose (*Oenothera biennis*), common knotweed (*Polygonum arenastrum*), German ivy (*Senecio mikaniodes*), English Ivy (*Hedera helix*), wild radish (*Raphanus sativus*), English plantain (*Plantago lanceolata*), black nightshade (*Solanum nigrum*), and common sowthistle (*Sonchus oleraceous*).

Wildlife diversity and abundance at the project site is expected to be low due to the disturbance associated with the site's developed nature and the relatively low-quality habitat consisting of ornamental plantings and ruderal species. During the field survey the only animal observed was a feral cat. Other species that commonly inhabit this type of disturbed habitat and known to occur within the park include the raccoon (*Procyon lotor*), opossum (*Didelphis virginiana*), striped skunk (*Mephitis mephitis*), domestic and introduced feral animals, and birds such as western scrub jay (*Aphelocoma californica*), domestic pigeon (*Columba livia*), American crow (*Corvus branchyrhychos*), northern mockingbird (*Mimus polyglottos*), and mourning dove (*Zenaida macroura*).[54] In addition to these species, the tall trees that border the site, and perhaps some of the smaller trees within the site, could support nests of a variety of native bird species protected under the Migratory Bird Treaty Act (MBTA), including raptors that are also protected under California Fish and Game Code. Please refer to the Special Status Species section below regarding raptors that are expected to occur within the park.

Sensitive Biological Resources

Sensitive biological resources include plants, animals, and habitats that have been afforded special recognition by federal, state, or local resource agencies and organizations. Also included are habitats with a relatively limited distribution or a particular value to wildlife. Searches of the California Department of Fish and Game's (CDFG) California Natural Diversity Database

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[54] Smith. 1994.

(CNDDB)[55] and the California Native Plant Society's (CNPS) online Inventory of Rare and Endangered Plants[56] were conducted to identify sensitive biological resources previously documented in the vicinity of the project site. Due to the urban nature and isolation of the habitat at the project site, only one USGS 7.5-minute quadrangle (San Francisco North) was included in the search. Other sources of information referenced during this investigation included the CDFG's State and Federally Listed Endangered, Threatened, and Rare Plants of California[57], the U.S. Fish and Wildlife Service's Endangered and Threatened Species[58], and the Jepson Manual: Higher plants of California[59].

Special-Status Species

Special-status species include those that are state-listed and/or federally listed as threatened or endangered, those considered candidates for listing as threatened or endangered, those identified by the USFWS and/or CDFG as species of concern, and those identified by CDFG as fully protected. Special-status plant species include those on CNPS Lists 1A (plants presumed extinct in California), 1B (plants rare, threatened, or endangered in California and elsewhere), or List 2 (plants rare, threatened, or endangered in California but more common elsewhere).

Twenty-nine special-status plant species were identified within the USGS 7.5-minute San Francisco North quadrangle[60,61], however, the project site lacks necessary habitat elements (e.g., serpentine soil, chaparral, vernal pools, marshes and swamp, broad-leaved upland and closed-cone coniferous forests) for all of these plants. As a result, the biologists determined that none of these special-status plants are expected to occur on the project site.

A total of eighteen special-status wildlife species have been documented within the San Francisco North quadrangle[62]; however, due to the absence of suitable habitat (e.g.,coastal scrub, sand dune, ocean, freshwater wetland, salt marsh) or other required elements, the only special-status species expected to occur on the project site is the sharp-shinned hawk (*Accipiter striatus*). The *Golden Gate Park Master Plan Background Report: Forests and Wildlife* notes the sharp-shinned hawk, which is considered a species of special concern by CDFG, to occur in the park and also lists common raptors including the great horned owl (*Bubo virginianus*), red-tailed hawk (*Buteo*

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[55] CNDDB. *Results of electronic record search.* California Department of Fish and Game, Wildlife and Habitat Data Analysis Branch. 2006.

[56] CNPS. Electronic inventory of Rare and Endangered Vascular Plants of California. Available at http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi. 2006.

[57] California Department of Fish and Game (CDFG) Habitat Conservation Division, Wildlife & Habitat Data Analysis Branch. *State and Federally Listed Endangered, Threatened, and Rare Plans of California.* 2006.

[58] U.S. Fish and Wildlife Service (USFWS). *Federal Endangered and Threatened Online Species List.* Available at http://www.fws.gov/sacramento/es/spp_list.htm. 2006.

[59] Hickman, J.C. (ed). *The Jepson Manual: Higher Plants of California.* 1993.

60 CNDDB. 2006.

[61] Smith, S.G. Golden Gate Master Plan, Background Report: Forests and Wildlife. Prepared by Stephen G. Smith, Forester, for the San Francisco Department of Recreation and Parks. 1994.

62 CNDDB. 2006.

jamaicensis), red-shouldered hawk *(Buteo lineatus)*, and American kestrel *(Falco sparverius)* to occur, noting that the later two are known to breed in the park.[63] These raptors are all protected under section 3503.5 of the California Fish and Game Code, which prohibits the destruction of raptors and their active nests. The tall trees immediately bordering the site are considered potential nesting habitat for these species.

Sensitive Habitats

Sensitive habitats include those identified as sensitive natural communities "rare and worthy of consideration" in the List of California Terrestrial Natural Communities Recognized by the CNDDB, as well as those protected under Section 404 of the Clean Water Act (CWA), Section 1602 of the California Fish and Game Code, and the State's Porter-Cologne Water Quality Control Act. The project site does not include any of these sensitive habitats.

There are no sensitive habitats on the project site.

DISCUSSION

a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?**

Although no special-status wildlife species have the potential to occur in the project area, the tall trees near the project site provide potential nest sites for several species of common raptors, including sharp-shinned hawk, great horned owl, red-tailed hawk, red-shouldered hawk, and American kestrel. Although these are not special-status species, raptors are protected under Section 3503.5 of the California Fish and Game Code, which prohibits the destruction of raptors and their active nests. Tree removal and construction activities could disturb these common raptors if nesting near the project site. Such disturbance could cause nest abandonment and result in loss of active nests, resulting in impacts to common raptors that would be potentially significant.

Implementation of Mitigation Measure 5 - Biological Resources presented on page 97 of this document would reduce potential impacts to nesting raptors to less-than-significant levels.

Operation of the project does not entail any activity that would be disruptive to wildlife or vegetation of concern in the park. Human and horse activity would increase at the site compared to present conditions. However, the nature of the activities is not intrinsically disruptive to park wildlife and would occur in an area lacking in highly sensitive resources.

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[63] Smith. 1994.

b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?**

The project site consists of previously developed and disturbed land that is dominated by weedy ruderal and landscaped vegetation. There are no riparian habitats or other sensitive natural communities on or adjacent to the project site that could be affected by project implementation.

c) **Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

There are no wetlands, as defined under Section 404 of the CWA or state codes, present on the site. Spreckels Lake is a small man-made lake several hundred feet to the north of the project site, but no project activity would occur in this area and no indirect effects to it are anticipated.

d) **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

No streams are present on site and therefore fish are absent. Due to the urban setting of the park, the project site does not serve as an important wildlife movement corridor or nursery site for native species. Wildlife corridors are features that provide connections between habitat patches that would otherwise be isolated and unusable. The park in the area of the project site is surrounded by urban uses. While the project would intensify local human use of the site that may diminish use by wildlife including migratory birds, it would not substantially change the open space habitat provided by the park as a whole. The project also would not create any substantial barriers to wildlife movements in the park.

e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

The project would be consistent with GGP Master Plan policies to protect plant life and conserve wildlife. The San Francisco Board of Supervisors recently adopted legislation that amended the City's Urban Forestry Ordinance, Public Works Code Sections 801 et seq., to require a permit from the DPW to remove any protected trees.[64] Protected trees include landmark trees, significant trees, or street trees located on private or public property anywhere within the territorial limits of the City and County of San Francisco.

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[64] Board of Supervisors, Ordinance No. 17-06, amending Public Works Code Sections 801 et seq.

A landmark tree has the highest level of protection and must meet certain criteria for age, size, shape, species, location, historical association, visual quality, or other contribution to the City's character and have been found worthy of landmark status after public hearings at both the Urban Forestry Council and the Board of Supervisors. A significant tree is a tree: a) within 10 feet of the property edge of the sidewalk that is above 20-feet in height, b) a canopy greater than 15 feet in diameter, or c) with a trunk diameter at breast height (DBH)[65] greater than 12 inches. A street tree is a tree within the public right-of-way and maintained by either the adjacent property owner or the City. Removal of a landmark, significant, or street tree requires a permit from DPW. Also, all such trees are subject to certain maintenance and protection standards. The San Francisco Planning Department, DBI, and DPW have established guidelines to ensure that the provisions concerning protected trees are implemented. As part of these guidelines, the Planning Department requires that a "Tree Disclosure Statement" accompany all permit applications that could potentially impact a protected tree whether the tree is on the subject site or adjacent sites.

There are a variety of trees on the project site as described in the Environmental Setting of Biological Resources, including one large blue gum eucalyptus (*Eucalyptus globulus*), located between the east end of the arena and the southern row of stables, which is proposed for removal. The blue gum eucalyptus tree has a trunk diameter greater than 12 inches and the project sponsor would be required to submit a tree disclosure statement to DPW with the proposed project's permit applications.[66] If the eucalyptus is found to be subject to the tree ordinance, there may be a requirement for replacement planting or in-lieu fees.[67]

No trees on the project site or within GGP have been nominated or designated by the Board of Supervisors as a Landmark Tree at this time. The blue gum eucalyptus tree is ornamental and common in San Francisco, and would not be considered scenic. Since the proposed project would not result in the removal of a substantial number of mature, scenic trees, it would result in a less-than-significant impact. Potential impacts as a result of the proposed tree removal would be mitigated through the DPW requirement for a Tree Disclosure Statement and Tree Removal permit.

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[65] Diameter at Breast Height is 4.5 feet above the ground surface surrounding the tree.

[66] As part of the review process for an application for street or significant tree removal, a DPW inspector would evaluate the trees proposed for removal. If DPW approves a tree to be removed, it will be posted for a period up to 30 days. If objections to the removal are received, the removal will be scheduled for a public hearing. If DPW denies the removal, the applicant can request the case be scheduled for a public hearing. After the hearing, a hearing officer will make a recommendation to the DPW Director, who in turn will issue a final decision. The DPW Director's decision may be appealed to the Board of Appeals.

[67] The GGP Master Plan recommends that individual large trees should be replaced in kind, with similar species, and that specimen sized trees should be used where feasible. However, the possibility of replacement planting or in-lieu fees would be determined by DPW at the time of review.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No local, regional, or state habitat conservation plans that include the project site have been adopted. Therefore, no impacts would occur.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
13. GEOLOGY AND SOILS— Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐	☐
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☐	☒
f) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Geology and Soils

GGP, including the project site, is underlain primarily by Holocene eolian dune sands.[68] The dune sands are generally clean, light gray, fine- to medium-grained, well sorted, loose, and vary in thickness to as much as 80 feet deep. The dune sands at GGP are underlain by the Colma Formation. The Colma Formation ranges up to 400 feet thick below the Park and consists of unconsolidated, moderately well sorted, fine- to medium-grained sand and silty sand with scattered clay beds ranging from 6 inches to 5 feet thick. Below the Colma Formation, the bedrock consists of the Franciscan Complex and the Great Valley Sequence.

Sirdak soils, located on the project site, are characterized as deep soils that have high infiltration rates and are well drained to excessively drained.[69] In addition, these soils have high hydraulic conductivity, low water holding capacity, and a moderate corrosion potential for uncoated steel. The depth to the water table for this soil component is typically more than six feet.

Landslides

A landslide is a movement of a mass of soil down a steep slope when the soil loses strength and can no longer support the weight of overlying soil or rocks. Slopes in GGP are generally not very steep, are underlain by well drained sandy soils, are well vegetated, and are not prone to slope stability problems, such as landslides and raveling.[70] This finding is confirmed by maps identifying potential landslide hazard areas in the City. T*he San Francisco General Plan Community Safety Element* contains maps that show areas of the City subject to geologic hazards, including landslides. Based on the Map 5, Areas Susceptible to Landslides, the project site is not located in an area considered to be a potential landslide hazard.[71] Similarly, based on the California Division of Mines and Geology Seismic Hazard Zone map for the City and County of San Francisco[72], the project site is not within an area where previous occurrence of landslide movement, or local geological, geotechnical, and subsurface water conditions indicate a potential or permanent ground displacements such that mitigation as required by Public Resources Code Section 2693(c) would be required[73].

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[68] San Francisco Recreation and Park Department (SFRPD). *Golden Gate Park Master Plan - Geology, Groundwater, and Recycled Water.* Prepared by Geo Resource Consultants. 1993.

[69] EDR. *The EDR Radius Map with GeoCheck Golden Gate Park Equestrian Center.* 2006.

[70] SFRPD. 1993.

[71] City and County of San Francisco. *San Francisco General Plan Community Safety Element.* Amended by Resolution No. 14149 and adopted on 6-27-96.

[72] California Division of Mines and Geology. *Seismic Hazard Zone – City and County of San Francisco Official Map.* 2001.

[73] Public Resources Code (PRC) 2693(c) defines mitigation as "those measures that are consistent with established practice and that will reduce seismic risk to acceptable levels." Section 2697 of the PRC specifies that "cities and

Seismicity

The project site is located in the San Francisco Bay Area, a region of high seismic activity. Several faults are located in the proximity of the Park, as shown in Table 8. The nearest mapped branch of the San Andreas fault, located in the Pacific Ocean, is approximately 3.3 miles southwest of the project site. The United States Geologic Service (USGS) estimates that there is a 23 percent chance of an earthquake with a magnitude of 7.0 occurring along one of the three active segments of the San Andreas fault within the next 30 years.[74]

Table 8
Nearby Faults and Their Characteristics

Faults	Approximate Distance from Park (mi)	Maximum Credible Earthquake	Average Values of Maximum Estimated Bedrock Acceleration (g)
San Andreas	4 SW	8.3	0.6
Hayward	15 E	7.5	0.34
Calaveras	25 E	6.0	0.10
Rodgers Creek	30 N	7.0	0.15
Green Valley	32 NE	6.6	0.10
Concord	27 NE	5.4	0.04

Source: Geo/Resource Consultants, Inc 1993.

Fault Rupture

No known active faults[75] cross the park.[76] As such, the Park, including the project site, is not located within a fault-rupture hazard zone delineated by the Alquist-Priolo Earthquake Fault Zoning Act[77]. The inferred trace of the City College fault runs approximately north to northwest through the western portion of the park.[78] This fault occupies a band of 0.5 to 1 mile wide and is not considered to be active by the California Division of Mines and Geology (CDMG).

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counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.

[74] City and County of San Francisco Planning Department. 1998.

[75] A fault is considered active based either on historical fault rupture or on geologic evidence that clearly demonstrates fault rupture during Holocene time (approximately within the last 10,000 years before present).

[76] SFRPD. 1993.

[77] The California legislature passed the Alquist-Priolo Earthquake Fault Zoning Act to mitigate the hazard to structures posed by surface faulting. The act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The act addresses the hazard of surface fault rupture, but not other earthquake hazards. Local agencies must regulate most development in fault zones established by the state geologist. Before a project can be permitted in a designated Alquist-Priolo Fault Study Zone, cities and counties must require a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults.

[78] SFRPD. 1993.

Groundshaking

Due to the proximity of faults in the region, the project area would be subject to groundshaking intensities in the event of an earthquake centered on any of the faults. The severity of ground shaking varies considerably over the impacted region depending on the size of the earthquake, the distance from the epicenter of the earthquake, the nature of the soil at the site, and the nature of the geologic material between the site and the fault. Groundshaking can cause damage to inadequately-designed or improperly-constructed structures and foundations.

The *San Francisco General Plan Community Safety Element* contains maps that assess groundshaking intensity within the City. Groundshaking Intensity Maps 2 and 3 were derived from projections made by the Association of Bay Area Government (ABAG) in 1995. According to these maps, 7.1 magnitude earthquakes on the Peninsula segment of the San Andreas fault and the Northern segment of the Hayward fault would result in VII – Nonstructural damage[79] according to the Modified Mercalli Scale[80].

ABAG maintains interactive maps that assess potential hazards, including groundshaking potential from Bay Area faults, for planning purposes. According to ABAG's interactive Shaking Hazard Maps, shaking potential associated with a 7.2 and 7.5 magnitude earthquake on the San Andreas (Peninsula segment and North Golden Gate segment, respectively) would result in a Modified Mercalli Intensity (MMI) shaking severity level of VIII-Very Strong[81].[82] The effects of an intensity level VIII correspond to moderate damage. Based on ABAG's analysis of groundshaking intensity from other earthquakes scenarios, groundshaking intensity would be less at the project site, although would still be considered strong (VII) if earthquakes occurred on the Hayward fault (6.5 magnitude for the North segment; 6.7 magnitude for the South segment; or 6.9 magnitude for the entire fault) or the Rodgers fault.[83] As described above, the effects of an MMI intensity level VII correspond with nonstructural damage.

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[79] The effects of an intensity level of VII are "difficult to stand; noticed by drivers of motor cars; hanging objects quiver; furniture broken; weak chimneys broken at roof line; fall of plaster, loose bricks, stones, tiles, cornices (also unbraced parapets and architectural ornaments); waves on ponds; small slides and caving in along sand or gravel banks; concrete irrigation ditches damaged."

[80] The Modified Mercalli Scale consists of 12 steps that describe the observed effects of an earthquake on people and facilities corresponding to increasing earthquake intensities.

[81] A VIII-Strong intensity level is characterized as follows: "Steering of motor cars affected; fall of stucco and some masonry walls; twisting, fall of chimneys, factory stacks, monuments, towers, elevated tanks; frame houses moved on foundations if not bolted down; loose panel walls thrown out; decayed piling broken off; branches broken from trees; changes in flow or temperature of springs and wells; cracks in wet ground and on steep slopes."

[82] ABAG Interactive Geographic Information Systems. *ABAG Earthquake Shaking Scenario – San Andreas-Peninsula Earthquake-Magnitude 7.2.* 2004a. *ABAG Earthquake Shaking Scenario – San Andreas-Peninsula Earthquake-Magnitude 7.5.* 2004b

[83] ABAG Interactive Geographic Information Systems. *ABAG Earthquake Shaking Scenario – North Hayward Earthquake – Magnitude 6.5.* 2004c. *ABAG Earthquake Shaking Scenario – North Hayward Earthquake – Magnitude 6.7.* 2004d. *ABAG Earthquake Shaking Scenario – North Hayward Earthquake – Magnitude 6.9.* 2004e.

The existing buildings onsite do not meet current codes for seismic performance. Some structures are dilapidated and possibly could collapse or undergo severe damage from earthquake groundshaking. As the buildings are not occupied, the risk to humans is low should they be damaged or collapse in an earthquake.

Liquefaction

Liquefaction occurs when rapid compaction during seismically induced ground shaking causes pore water pressure to increase to a point that it equals the confining pressure of the soil. Liquefaction can cause serious building foundation failures due to the loss of foundation bearing strength.

Map 4, Seismic Hazards Study Zone – Areas of Liquefaction Potential, of the San Francisco General Plan Community Safety Element identifies areas of liquefaction potential within the City. Based on this map, the project site is not located within an area of liquefaction potential.[84] Based on the California Division of Mines and Geology Seismic Hazard Zone map for the City and County of San Francisco[85], the project site is not located within an area where historical occurrence of liquefaction, or local geological, geotechnical, and groundwater conditions indicate a potential or permanent ground displacements such that mitigation as required by Public Resources Code Section 2693(c) would be required[86].

ABAG's Liquefaction Maps identify liquefaction susceptibility at the project site as moderate.[87] However, based on a geological study conducted for the entire Park, the potential for liquefaction would occur only in an area further west of the project site (west of North Lake).

Lateral spreading results from the horizontal displacement of alluvial material toward a slope or stream cut bank during groundshaking. This movement is due to ground failure, most likely liquefaction, of one or more layers of alluvium exposed in the open slope face or on nearly flat-lying terrain where horizontal displacement takes place toward an unsupported slope face. There are no open slopes at the project site.

Groundshaking can also produce compaction and densification of dry, uniformly graded, granular material that is loose in consistency.

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[84] City and County of San Francisco. 1996.

[85] California Division of Mines and Geology. 2001.

[86] Public Resources Code (PRC) 2693(c) defines mitigation as "those measures that are consistent with established practice and that will reduce seismic risk to acceptable levels." It should be noted that Section 2697 of the PRC specifies that "cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.

[87] ABAG. 2004b.

Other Soil Stability Issues

Soil erosion, lateral spreading, and differential settlement are other types of soil stability issues. Some types of soil stability issues are secondary seismic effects caused by groundshaking. In general, soil stability issues result in damage to structures and foundations that are inadequately designed or improperly constructed.

Soil erosion in GGP is minor and generally confined to limited areas including well travelled trails.[88] The equestrian center site was not identified in the GGP Master Plan as one of the locations with soil erosion problems. While sandy soil is commonly subject to erosion by wind and runoff, the abundant vegetation within GGP assists in the prevention of severe soil erosion.[89]

The amount of compaction across an area can vary due to the differences in soil types, producing differential settlement. Because the soils in GGP are primarily unconsolidated fine to medium sands, the risk of densification and differential settlement is considered to be moderate to high.[90] As stated, the effects of differential settlement are apparent in the grandstand and contribute to its deteriorated condition.

DISCUSSION

a) **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)**

As described in the Environmental Setting, the project site is not located within an Alquist -Priolo Earthquake Fault Zone for fault rupture hazard, and the potential for fault rupture to damage the proposed facilities is considered low. No impacts associated with the exposure of people or structures to potential substantial adverse effects (risk of loss, injury or death) from fault rupture would occur.

ii) **Strong seismic ground shaking?**

Due to the location of the site within the seismically active region of Northern California and proximity to the San Andreas and Hayward faults, the project area would be subject to strong to very strong ground shaking. These intensities would result in nonstructural damage and moderate damage, respectively. The Proposed Project would improve the safety of the site by removing the grandstand (a facility that currently poses a hazard) and other dilapidated structures, upgrading the WPA stables to meet the latest seismic and building codes, and constructing other buildings (including habitable structures) that meet the seismic and building codes. The final building plans would be reviewed by the Department of Building Inspection (DBI). In reviewing building plans, the DBI refers to a variety of information sources to determine existing hazards and assess requirements for mitigation. Sources reviewed include maps of Special Geologic Study Areas and known landslide areas in San Francisco as well as the building inspectors' working knowledge of areas of special geologic concern. If the need were indicated by available information, DBI would require that site specific soils reports be prepared by a California licensed geotechnical engineer prior to construction. Therefore, potential damage to structures from geologic hazards on a project site would be mitigated through the DBI requirement for a geotechnical report and review of the building permit application pursuant to DBI implementation of the Building Code.

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[88] SFRPD. 1993.
[89] SFRPD. 1993.
[90] SFRPD. 1993.

iii) Seismic-related ground failure, including liquefaction?

The project site is not located in an area with the potential for liquefaction hazard as determined by CDMG, the Community Safety Element of the City of San Francisco General Plan and the site-specify geologic study conducted for the Park. As such, construction and operation of the project would not result in an exposure of people or structures to potential substantial adverse effects (risk of loss, injury or death) from liquefaction hazards.

iv) Landslides?

The proposed facilities would be located within a generally flat area where landslides are not considered a hazard. No impacts associated with the exposure of people or structures to potential substantial adverse effects (risk of loss, injury or death) from landslides would occur.

b) Result in substantial soil erosion or the loss of topsoil?

Construction activities such as excavation would expose soils to wind and water erosion forces. Excavation would occur for the foundations of the new structures. Approximately 1,777 cubic yards of soil would be generated from excavation activities at the project site.[91] Approximately 300 cubic yards of the excavated soil may be used to raise the finish elevation of the arena by six to eight inches to prevent rain run-off flow into the arena.[92] Implementation of dust suppression measures and best management practices (BMP) for soil erosion control, as identified in the Air Quality and Hydrology sections respectively would ensure that potential impacts would be considered less than significant. During construction, requirements to reduce erosion would be implemented pursuant to California Building Code Chapter 33, Excavation and Grading. During operations the project would comply with all local wastewater discharge requirements.

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[91] Hobson, Mary. SFPRD. November 2006.

[92] Ibid.

Operation of the Proposed Project would generate horseback riding activities within the new proposed arena as well as on existing trails. Activities inside the arena would not result in any off-site erosion as the arena would be enclosed and covered. The use of the existing, multiple use paths to nearby arenas would likely increase with the project. Although the use of the trails by horses would likely kick up dust locally and result in soil compaction and erosion, due to the abundant amount of vegetation along the trails, significant soil erosion or loss of topsoil would not be expected. Additionally, normal procedures for trail maintenance would be undertaken by Park maintenance staff. Thus, the impact would be considered less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Landslides and liquefaction are discussed in the Environmental Setting section. Lateral spreading is not expected to occur as there are no open or unsupported slope faces. The improvement of existing facilities or placement of the new facilities would not require changing the terrain of the site or subsurface soil such that the soil unit becomes unstable and results in on- and off-site landslide, lateral spreading, liquefaction, or collapse. Therefore, no impact would occur.

Construction of the project would require minor excavation of up to 5 feet where the hay barn/feed storage building is proposed. At the site, groundwater is located approximately 25 to 30 feet deep.[93] Construction activities would not encounter groundwater and dewatering would not be required. Therefore, the potential for subsidence or settlement would be considered less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial risks to life or property?

Sirdak soils, located on the project site, are characterized as deep soils that have high infiltration rates and are well drained to excessively drained.[94] These soils are not considered to have high shrink-swell potential. Potential damage to the proposed structures or risks to people using these structures are not expected from expansive soils. Therefore, no impacts would occur.

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[93] SFRPD. 1993.

[94] EDR. 2006.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Septic tanks are not proposed as part of this project. All facilities would be connected to the Park's existing sewer and drainage systems. Therefore, impacts associated with soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems are not applicable.

f) Change substantially the topography or any unique geologic or physical features of the site?

This impact is not applicable as the site does not contain unique geologic or physical features.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
14. HYDROLOGY AND WATER QUALITY—Would the project:					
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	☐	☐	☒	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	☐	☐	☐	☒	☐
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒	☐
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒	☐
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Surface Waters

There are no natural waterways within GGP. All of the water impoundments in GGP are artificial and are supplied by well water[95] because most do not receive enough precipitation or natural inflow to offset evaporation and leakage.[96] Two lakes are located in the vicinity of the project site, including Spreckels Lake and the Fly Casting Pond. These surface water bodies are located approximately 200 feet north and 500 feet south of the edge of the project site, respectively. Stormwater drains generally to the west, following the gradual downward gradient of the topography. The sandy soils generally promote rapid infiltration of runoff and the gentle gradients of the site and vicinity slow the concentration of runoff.

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[95] SFRPD. 1993.

Groundwater

The project site overlies a portion of the Westside Groundwater Basin. This basin is approximately two miles wide and 11 miles long.[97] The Westside Basin is comprised of unconsolidated sediments overlying bedrock. The unconsolidated sediments, or aquifer materials, generally consist of dune sands and the underlying Colma Formation. Within GGP, the aquifer ranges from less than 100 feet to approximately 400 feet thick. Aquifer testing conducted in the Westside Basin indicates relatively high permeabilities and groundwater flow rates. Recharge to the Westside Basin is from rainfall, irrigation return-flow, sewer and water pipe and lakes leakage, and groundwater inflow from adjacent basins. Groundwater production in GGP is primarily from layers of sandy sediments of the Colma Formation. With the exception of high nitrates, groundwater quality is generally good.

There are no groundwater pumping wells located within the project site.

Drainage System

Existing drainage inlets are located throughout GGP, including the project site. There are 17 inlets at the project site. Most of the drainage systems in GGP have been operating since the 1930s.[98] Drainage systems in the park consist of catch basins that are typically five to six feet deep that connect to French drains[99]. Catch basins also drain into GGP lakes. At the project site, there are 17 drainage inlets that drain into the combined sewer system. In 1994, the SFRPD investigated the condition of the sewer and drainage system in GGP. SFRPD proposed to construct new sewer lines for all inadequate sewer systems (including the sewer line serving the Polo Fields), construct new catch basins and connect them to existing sewer lines, construct French drains or leach lines for drainage problem areas if there are no existing lines, and design a maintenance schedule to clean all the catch basins periodically. These infrastructure improvements were made in the last several years as part of the 1992 Golden Gate Park Infrastructure Bond Work.

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[96] City and County of San Francisco Planning Department. 1998.

[97] SFRPD. 1993.

[98] SFRPD. *Golden Gate Park Sewer and Drainage System Master Plan*. 1994.

[99] French drains are containers that allow the water to percolate into the ground and return water to the aquifer below.

Flooding

Based on the *City of San Francisco Community Safety Element,* San Francisco is not subject to flooding of natural waterways.[100] Existing drainage problems were identified in the roadway east of the project site, at the north entrance of the polo field according to the *Golden Gate Park Sewer and Drainage System Master Plan.*[101]

Tsunami

Tsunami are large waves in the ocean generated by earthquakes, coastal or submarine landslides, or volcanoes. Areas that are highly susceptible to tsunami inundation are located in low lying coastal areas. According to Map 6, 20-foot Tsunami Run-up Map of the City's Safety Element and the ABAG Tsunami Evacuation Planning Map[102], the project site is not located within a Tsunami run-up area.[103]

DISCUSSION

a) Violate any water quality standards or waste discharge requirements?

Construction activities would typically result in potential water quality degradation of downstream waterways or water bodies through sedimentation into adjacent creeks, lakes, or the local storm drains. There are no creeks in or around the project site. Sediments generated from construction activities would not drain into nearby water bodies, Spreckels Lake and Fly Casting Pond, as they are either upstream of the project site or at a distance that would be unaffected (due to the intervening drainage system or vegetation that would capture sediments before arriving at the ponds). The most likely impact for construction sediments is discharge into storm drain catch basins in and around the project site, possibly clogging them or reducing their capacity to convey flows.

The San Francisco RWQCB specifies that any project with a combined disturbance area of over one acre must obtain a general permit under the National Pollutant Discharge Elimination System (NPDES) Stormwater Program. The general permit requires the implementation of best management practices (BMPs) to reduce pollutant loads into the "waters of the state" and measures to reduce sediment and erosion. In conjunction, a Storm Water Pollution Prevention Plan (SWPPP) must be prepared and implemented. SWPPPs require that stormwater discharges associated with construction activity, where clearing, grading, and excavating would disturb soil, must be free of site pollutants. It must also address post-construction control of pollutants in stormwater. The SWPPP does not have to be submitted to the RWQCB, but must be on site and available to inspectors.

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[100] City of San Francisco Planning Department. 1996.

[101] SFRPD. 1994.

[102] The evacuation planning maps are based on modeling of potential earthquake sources and hypothetical extreme undersea, nearshore landslide sources. Maximum run-up to a specific contour was determined to be reasonable. This contour is 42 feet (ABAG, No date).

[103] City and County of San Francisco. 1996. ABAG. *Tsunami Evacuation Planning Map for San Francisco & San Mateo Counties.* No Date.

The entire project site is 2.06 acres. Of that amount, a combined total of more than 24,460 square feet (>0.5 acres) of existing structures would be demolished or new structures would be built. Demolition, clearing, excavation, and grading activities would occur in and around the footprints of the old structures to be removed and new facilities. With the addition of other proposed construction activities onsite (resurfacing of pathways, road, and parking lot, landscape improvements, installation of fencing), and staging areas of equipment and materials, the total disturbance area would exceed an acre at the project site. Therefore, the SFRPD would be required to obtain a general permit from the RWQCB and require its contractors to prepare and implement a SWPPP that identifies BMPs to prevent or reduce pollution into surface waters.

The SWPPP would specify BMPs to prevent construction pollutants from contacting stormwater, with the intent of keeping products of erosion from moving offsite into receiving waters. BMPs include measures guiding the management and operation of construction sites to control and minimize the potential contribution of pollutants to storm runoff from the project area. These measures address procedures for controlling erosion and sedimentation and managing all aspects of the construction process to ensure control of potential water pollution sources. Erosion and sedimentation control practices could include use of water filters over storm drains; installation of silt fencing, straw wattle, fiber rolls, mulch, soils stabilization, detention basins, straw bales, silt check dams, geofabrics, drainage swales, sand bag dikes; revegetation; stockpiling of topsoil removed during construction and covering it to reduce erosion; wetting of dry and dusty surfaces to prevent fugitive dust emissions; runoff control; installation of drip pans beneath the machinery engine block and hydraulic systems; or other applicable techniques to limit increases in sediment in stormwater runoff.

Compliance with RWQCB requirements to prepare and implement a SWPPP would ensure that impacts would be considered less than significant.

The horse manure may be a pollution source during the Proposed Project's operation onsite and on trails between the project site and nearby arenas. Implementation of Mitigation Measure 3 - Air Quality, which would require a manure management, storage, and trail waste disposal plan, and Mitigation Measure 4 – Hydrology and Water Quality would reduce potential impacts to water quality as a result of horse waste.

b) **Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?**

The project site is located over the Westside Aquifer. Groundwater at the site is approximately 25 to 30 feet below ground surface.[104] The Proposed Project would not require withdrawal of groundwater. The proposed facilities would generally be located in an area that is already developed and/or paved, and would result in the creation of minimal net new impermeable surfaces as a result of the new buildings. The increase in impermeable surfaces would not substantially reduce groundwater recharge of the Westside Aquifer because the sandy soil and retarded concentration of runoff would promote rapid infiltration of runoff across overall land area and infiltration via French drains. As such, the Proposed Project would not result in the depletion of groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. No impact would occur.

Construction of the project would require excavation of up to 5 feet where the hay barn/feed storage building is proposed. The local groundwater table is located approximately 25 to 30 feet from the project site.[105] Construction activities would not require dewatering.

Any groundwater encountered during construction of the proposed project would be subject to requirements of the City's Industrial Waste Ordinance (Ordinance Number 199-77), requiring that groundwater meet specified water quality standards before it may be discharged into the sewer system. The Bureau of Environmental Regulation and Management of the Department of Public Works must be notified of projects necessitating dewatering; that office may require water analysis before discharge.

c) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial on- or off-site erosion or siltation?**

There are no streams or rivers located at the project site. The Proposed Project would require the removal of up to 17,076 square feet of existing facilities and the construction of nearly 24,500 square feet of new facilities. New structures would occur primarily within an area currently underlain by impermeable surface (concrete) or within the footprints of demolished buildings.

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[104] SFRPD. 1993.

[105] SFRPD. 1993.

Thus, the net change in impermeable surface is 7,424 square feet. Additionally, site excavation would be limited to the areas proposed for new structures (approximately 5 feet deep maximum where the hay barn/feed storage building is proposed) and would not substantially alter the site topography. As noted, while sandy soils are subject to erosion, the vegetation cover and low slopes reduce the soil erosion hazard to low land. Therefore, the installation of the new buildings would not substantially alter the drainage pattern of the site, and the potential for erosion or siltation from the alteration of the existing drainage pattern would be considered less than significant.

d) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in on- or off-site flooding?**

As discussed above, proposed facilities would be located generally within the existing developed area, and 7,424 square feet net new impermeable surfaces would be created as a result of the new buildings. Drainage inlets would be installed around the new buildings to handle runoff from these structures and connect to the combined sewer system. The rate and amount of surface runoff from the new impermeable surfaces would approximately double that at present, but is not expected to increase substantial off site flooding. Stormwater runoff at the site would continue to directly infiltrate into the ground or drain into the existing drainage system. Improvements to the existing combined sewer and drainage system were completed in the project area recently to handle wet and dry weather flows from the area, and the system would have sufficient capacity to accommodate both existing stormwater flows and the minimal increase in runoff associated with the new impermeable surfaces. As such, the proposed project would not substantially increase the rate or amount of surface runoff in a manner, which would result in on- or off-site flooding. Impacts would be considered less than significant.

e) **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

The majority of the runoff expected from the project site would be associated with the increase in impermeable surfaces during a storm event. Minor contributions would be associated with the caring of horses in the stables (washing). The contribution of both sources is not expected to exceed the capacity of existing or planned stormwater drainage systems; as discussed above, improvements to the existing sewer and drainage system were completed in the project area recently and the system is expected to have sufficient capacity to accommodate additional runoff associated with the increase in impermeable surfaces. Operations of the equestrian center would not require the use of any chemicals that would be considered toxic to the environment. Therefore, runoff from the project site would not be polluted. Potential impacts associated with the exceedance or capacity of the existing stormwater drainage system or additional sources of polluted runoff would be considered less than significant.

Operation of the Proposed Project would involve the housing and care for horses. Horse waste within the equestrian center would be collected and stored in the proposed manure bunker until it is trucked to the composting area within the Park. The waste would not be left out in the open to be washed into nearby drainage system. Horse care products could be washed into the drainage system; however, it would not be toxic and is not expected to degrade water quality. Therefore, the project would not substantially degrade water quality and impacts would be considered less than significant.

f) Otherwise substantially degrade water quality?

The project includes no elements other than those previously discussed that would be a source of water pollution either directly or indirectly.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The City of San Francisco does not participate in the National Flood Insurance Program (NFIP) and no flood maps are published for the City. According to the City of San Francisco General Plan, San Francisco is not subject to flooding of natural waterways. Because there are no natural waterways at the project site, there are also no 100-year flood hazard areas. The proposed facilities including the caretaker and steward's units would not be located within a 100-year flood hazard area. No flooding impacts would occur.

h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?

As described above, there are no natural waterways at the project site. Thus, the project site would not be located within a 100-year flood hazard area. As such, no flooding impacts associated with the impediment or redirection of flood flows in a 100-year flood hazard area would occur.

i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

There are no levees or dams located upstream of the project site. Therefore, no impacts associated with flooding from failures of these facilities would occur.

j) Result in inundation by seiche, tsunami, or mudflow?

Tsunami run-up is expected along Ocean Beach, which is located nearly one mile west of the site. Due to the project site's inland location, tsunami by inundation would not occur. No impacts would occur.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
15. HAZARDS AND HAZARDOUS MATERIALS Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

EDR conducted a regulatory database search for a one-mile radius surrounding the project site. The regulatory database search report included a list of sites adjacent to and in the vicinity of the project site that had documented use, generation, storage, or releases of hazardous materials or petroleum products. The information provided in the EDR database search was obtained from publicly available sources. Those databases included, but are not limited to, the following:

- Cortese List – Governor's Office of Planning and Research
- Leaking Underground Storage Tanks – RWQCB
- Comprehensive Environmental Response Compensation and Liability Information System – U.S. EPA Superfund Sites
- National Priority List – U.S. EPA Priority Superfund Sites
- Annual Work Plan – California Environmental Protection Agency

According to the EDR database search, there are no known or potentially hazardous waste sites, landfills, hazardous waste generators, or disposal facilities within 0.25 mile of project site.[106] Eight sites are located between 0.25 and 0.5 miles from the site; these sites are all located outside the park. The City has adopted an ordinance (Ordinance 253-86, signed by the Mayor on June 27, 1986) which requires analyzing soil for hazardous wastes within specified areas and on sites specifically designated by the Director of Public Works when: 1) at least 50 cubic yards of soil are disturbed, 2) there is construction on the bay side of the historic high-tide line, or 3) there is reason to believe that hazardous waste may be present. The ordinance, known as the Maher Ordinance, now Article 22A of the Health Code, targets sites which may have had toxic materials used in site fill material. The Department of Public Health would review project plans in order to determine whether the sponsor would need to submit an application.

Asbestos

Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The Bay Area Air Quality Management District (BAAQMD) is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or abatement work.

Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished/altered including size, age and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used.

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[106] EDR. 2006.

The District randomly inspects asbestos removal operations. In addition, the District would inspect any removal operation concerning which a complaint has been received.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material is required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Pursuant to California law, the Department of Building Inspection (DBI) would not issue the required permit until the applicant has complied with the notice requirements described above.

Lead-Based Paint

Because of the age of the existing buildings, which are proposed for demolition as part of the project, they may contain lead-based paint. Demolition must comply with Chapter 34, Section 3407 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on any building built on or before December 31, 1978, or any steel structures to which lead-based paint disturbance or removal would occur, and exterior work would disturb more than 100 square feet or 100 linear feet of lead-based paint, Chapter 34 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Chapter 34 contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the Department of Housing and Urban Development (HUD) Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall make all reasonable efforts to prevent migration of work debris beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The ordinance also includes notification requirements, contents of notice, and requirements for signs. Notification includes notifying bidders for the work of any paint inspection reports verifying the presence or absence of lead-based paint in the regulated area of the proposed project. Prior to commencement of work, the responsible party must provide written notice to the

Director of DBI of the location of the project; the nature and approximate square footage of the painted surface being disturbed and/or removed; anticipated job start and completion dates for the work; whether the responsible party has reason to know or presume that lead-based paint is present; whether the building is residential or nonresidential, owner-occupied or rental property, approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. (Further notice requirements include Sign When Containment is Required, Notice by Landlord, Required Notice to Tenants, Availability of Pamphlet related to protection from lead in the home, Notice by Contractor, Early Commencement of Work [by Owner, Requested by Tenant], and Notice of Lead-Contaminated Dust or Soil, if applicable.) The ordinance contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

These regulations and procedures established by the San Francisco Building Code would ensure that potential impacts associated with lead-based paint disturbance during construction activities would be reduced to a level of insignificance.

DISCUSSION

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction activities would require the use of certain potentially hazardous materials such as fuels, oils, and solvents. These materials would generally be used for excavation equipment, generators, and other construction equipment and would be contained within vessels engineered for safe storage. Spills during on-site fueling of equipment or an upset condition (e.g., puncture of a fuel tank through operator error), could result in a release of fuel or oils into the environment, including the combined sewer and drainage system. Implementation of BMPs for sediment and erosion control, required by the RWQCB for construction activities greater than one acre, would ensure that risks associated with hazardous materials release would be less than significant (see the Topic 14, Hydrology and Water Quality for a discussion of the RWQCB requirements). A combined total of more than 24,460 square feet (>0.5 acres) of existing structures would be demolished or new structures would be built. Demolition, clearing, excavation, and grading activities would occur in and around the footprints of the old structures to be removed and new facilities. With the addition of other proposed construction activities onsite (resurfacing of pathways, road, and parking lot, landscape improvements, installation of fencing), and staging areas of equipment and materials, the total disturbance area would exceed an acre at the project site. Therefore, the SFRPD would be required to obtain a general permit from the RWQCB and require its contractors to prepare and implement a SWPPP that identifies BMPs to prevent or reduce pollution into surface waters.

In addition, it is common construction practice to have in place a health and safety plan. This includes site control, emergency response, hazardous materials management, spill prevention, and spill response/cleanup measures onsite during construction activities. These measures include the provision of a facility site plan that describes the locations of the hazardous waste storage areas, access and egress routes, spill control and countermeasures, an inventory of emergency equipment, and notification and documentation procedures.

In the long-term, the project site would be used as an equestrian center. Activities onsite would include the housing and caring of horses, horseback riding within the proposed arena and nearby trails, and storage of related items associated with the care of the animals. Such activities do not require the use of toxic or hazardous materials. Operation of the equestrian center is not expected to involve the substantial require use of hazardous material. Minimal transportation, usage, storage or disposal of hazardous materials such as fuel, solvents, pesticides, medicines, etc. would occur as is common in urban areas. Therefore, the impact is less than significant.

Rodents are known to exist in GGP, which may expose the horses to potential rodent borne infectious diseases. The GGP Equestrian Center buildings would be required to comply with the City and County of San Francisco's Health Code Article 2, Section 92 which addresses rodent control. Section (c) of this code states that "all building and basement walls of all storerooms, warehouses, residences or other buildings within the City and County; all chicken yards or pens, chicken coops or houses, and all barns and stables, shall be so constructed or repaired as to prevent rodents from being harbored underneath the same or within the walls thereof, and all food products or other products, goods, wares and merchandise liable to attract or to become infested or infected with rats, rodents, whether kept for sale or for any other purpose, shall be so protected by the owner or occupant as to prevent rodents from gaining access thereto or coming in contact therewith." Compliance with this code would reduce potential exposure to rodent borne infectious diseases and impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?

Please refer to item a) above for a discussion of construction-related effects.

No known or potentially hazardous waste sites, landfills, hazardous waste generators, or disposal facilities are located within 0.25 mile of project site[107] and the potential for a significant hazard to the public or the environment through the encounter and release (from excavation activities) of hazardous materials would be considered less than significant.

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[107] EDR. 2006.

The Proposed Project would involve the demolition of several structures, including the grandstand, the hay barn, converted house trailer, and four small structures (structures identified in Figure 4). Due to the age of these structures, these buildings may contain hazardous materials, specifically asbestos and lead[108], which is a potentially significant impact. No studies have yet been conducted to determine the presence of asbestos. Lead is likely present due to the age of the structures (the existing buildings were all constructed prior to 1979 and so may contain lead paint). Demolition of these structures could result in the release of asbestos and lead that would pose a hazard to the public or the environment. Conformance with the regulations and procedures described in the Environmental Setting above, the regulations and procedures by OSHA and the San Francisco Building Code, and compliance with City ordinance regarding hazardous materials would ensure that potential impacts associated with the release of lead and asbestos as a result of the ancillary structures and grandstand demolition, would be reduced to less than significant.

c) **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

No schools, either existing or proposed, are located within one-quarter mile of the project site. Due to the distance of the schools and because operations of the equestrian center would not emit hazardous emissions or handle hazardous or acutely hazardous material substances, no impact would occur.

d) **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

The project site has not been listed as a hazardous material site compiled pursuant to Government Code Section 65962.5. The redevelopment of the project site would not create a significant hazard to the public or the environment. Therefore, no impact would occur.

e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

The project site is located more than 12 miles from the San Francisco International Airport (SFO). Safety hazards for people residing or working in the project area would not occur. Therefore no impact would occur.

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[108] Materials commonly used in older buildings that may pose public health hazards include asbestos, electrical equipment such as transformers and fluorescent light ballasts that contain polychlorinated biphenols (PCBs), fluorescent lights containing mercury vapors, and lead-based paints (City and County of San Francisco Planning Department 1998). Asbestos and lead paint have been identified in past Park building rehabilitation projects.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The Proposed Project is not located within the vicinity of a private airstrip. Safety hazards for people residing or working in the project area would not occur. No impact would occur.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

San Francisco ensures fire safety primarily through provisions of the Building Code and the Fire Code. Existing buildings are required to meet standards contained in these codes. In addition, the final building plans for any new residential project greater than two units are reviewed by the SFFD (as well as the DBI), in order to ensure conformance with these provisions. The Proposed Project would conform to these standards, which (depending on building type) may also include development of an emergency procedure manual and an exit drill plan. In this way, potential fire hazards (including those associated with hillside development, hydrant water pressure, and emergency access) would be mitigated during the permit review process. Accordingly, the Proposed Project would not result in an impact associated with an emergency plan or fires.

h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The project site is located within an urban area; there are no wildlands surrounding the project site, although forest is located within the park and at the project site vicinity. The proposed facilities would not involve use of fire or materials likely to result in combustion and therefore would not expose people or structures to a significant risk of loss loss, injury, or death involving wildland fires. No impact would occur.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
16. MINERAL AND ENERGY RESOURCES—Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☐	☒
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Golden Gate Park was constructed on sand dunes and is not located in an area of known mineral resources. As identified in the City and County of San Francisco General Plan's Environmental Protection Element, mineral resources are not found in San Francisco to any appreciable extent.

DISCUSSION

a-b) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975 (CDMG, Open File Report 96-03 and Special Report 146 Parts I and II). This designation indicates that there is inadequate information available for assignment to any other MRZ and thus, the site is not a designated area of significant mineral deposits. Since the project site is already developed, future evaluation or designation of the site would not affect or be affected by the Proposed Project. There are no operational mineral resource recovery sites in the project area whose operations or accessibility would be affected by the construction or operation of the proposed project. Therefore, criteria 16a and b are not applicable to the Proposed Project.

c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?

New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Code of Regulations. Documentation showing compliance with these standards is submitted with the application for the building permit. The Proposed Project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulations enforced by the DBI. For this reason, the project would not cause a wasteful use of energy.

San Francisco consumers have recently experienced rising energy costs and uncertainties regarding the supply of electricity. The root causes of these conditions are under investigation and are the subject of much debate. Part of the problem may be that the State does not generate sufficient energy to meet its demand and must import energy from outside sources. Another part of the problem may be the lack of cost controls as a result of deregulation. The California Energy Commission (CEC) is currently considering applications for the development of new power-generating facilities in San Francisco, the Bay Area, and elsewhere in the State. These facilities could supply additional energy to the power supply "grid" within the next few years. These efforts, together with conservation, will be part of the statewide effort to achieve energy sufficiency. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco and the State, and would not in and of itself require a major expansion of power facilities. Therefore, the energy demand associated with the proposed project would not result in a significant physical environmental effect or contribute to a cumulative impact.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
17. AGRICULTURE RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. **Would the project:**					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland of Statewide Importance, to non-agricultural use?	☐	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The project site is located within GGP and has no agricultural use. The entire City and County of San Francisco is identified as urban and built-up land by the California Department of

Conservation and does not have land used for agricultural purposes.[109] Therefore, the Proposed Project would not result in: any impacts or conversion of Prime, Unique, or Statewide Importance Farmland; conflict with existing zoning for agricultural use or Williamson Act contract; or result in conversion of Farmland of Statewide Importance to non-agricultural use.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
18. MANDATORY FINDINGS OF SIGNIFICANCE—Would the project:					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐	☐
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐	☐
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒	☐

DISCUSSION

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?

As described in Section D, Topic 12, the Proposed Project would not have a significant impact to biological resources such that the quality of the environment would be degraded. However, Section D, Topic 4 identifies a potentially significant impact to historic resources, which will need to be further evaluated. GGP is listed in the NRHP, in which contributing features include the GGP Stadium and GGP Stables. The GGP district itself would not be eliminated. However, the effect of the demolition of the historic grandstand and proposed new structures in relation to the GGP Stables and Stadium may be a potentially significant effect on historic resources, and will be further evaluated in the EIR.

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[109] California Department of Conservation. *Important Farmland in California.* 2002.

b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**

The Proposed Project is a use consistent with other uses in GGP and with the adopted Master Plan. Most impacts of the project are site specific. Air emissions are the sole cumulative impact of the project, but as noted in Section E, Topic 7, these are less than significant with mitigation. Therefore, the Proposed Project would not have unavoidable environmental effects that are cumulatively considerable.

c) **Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?**

The Proposed Project would not have any impacts that will cause substantial adverse effects on human beings.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

Mitigation measures necessary to focus topics out of the EIR are identified herein. The following mitigation measures relate to topics determined to require no further analysis in the EIR. The EIR will contain a mitigation chapter describing these measures, and measures that would be, or could be, adopted to reduce significant adverse effects of the project, identified in the EIR.

The project sponsor has agreed to implement the following mitigation measures that are necessary to avoid potential significant effects as identified in this Initial Study.

Mitigation Measure 1 - Cultural Resources (Accidental Discovery)

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review

Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archaeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Major Environmental Analysis (MEA) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measures 2 - Air Quality

The BAAQMD recommends the following basic control measures for project less than 4 acres in size. Due to the small size of the Proposed Project (approximately 2 acres), the following basic control measures would reduce construction-related air quality impacts of the Proposed Project to a less-than-significant level. In addition to the mitigation measure provided below, project construction activities shall comply with all applicable BAAQMD rules and regulations including Rule 6 (Particulate Matter and Visible Emissions), Rule 8-3 (Architectural Coatings), and 8-15 (Emulsified and Liquid Asphalts).

- Water all active construction areas at least twice daily, and more often during times of high wind.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
- Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

Mitigation Measure 3 - Air Quality

To ensure compliance with Article 6 of the San Francisco Health Code, which requires manure and stable refuse to be removed from the stables at least semi-weekly and the stables be kept in a clean and sanitary condition, the SFRPD shall prepare a manure management, storage, and trail waste disposal plan to minimize resultant odors to surrounding areas. Manure shall be removed from stables on a daily basis and temporarily stored in the manure bunker. The plan shall specify the schedule and frequency of onsite manure management and storage, as well as the collection and disposal of waste on the trails used between the project site and nearby arenas.

Mitigation Measure 4 – Hydrology and Water Quality

- The manure storage bunker shall be constructed of impervious material and be designed such that surface runoff from surrounding areas are prevented from entering the storage area and runoff of contaminated water from the storage area shall be prevented by roofing the manure bunker. Grass filter strips shall be installed around the storage bunker to catch any runoff from the storage site.

- Water from stables shall be directed to the drains that connect to the combined sewer system by a system designed to prevent such runoff from going off-site.

Mitigation Measure 5 - Biological Resources (Nesting Raptors)

- If project activity would commence during the raptor nesting season (February 1 to August 31), preconstruction surveys shall be conducted in areas of suitable nesting habitat within 500 feet of project activity. Surveys shall be conducted within 14 days prior to commencement of project activity. If no active nests are found, no further mitigation shall be required. If construction is initiated and completed outside of the raptor nesting season, no mitigation is required.

- If an active raptor nest is found, appropriate buffers shall be established. No project activity shall commence within the buffer area until a qualified biologist confirms that the nest is no longer active. CDFG guidelines recommend implementation of 500-foot buffers, but the size of the buffer may be adjusted if a qualified biologist determines it would not be likely to adversely affect the nest. Monitoring of the nest by a qualified biologist may be required if the activity has potential to adversely affect the nest.

Environmental Enhancement Measure 1 - Transportation and Circulation

- The SFRPD shall install signs along the trails that will be used between the project site and arenas which would inform users of the multi-use trail. These signs would communicate trail use and indicate which users should yield to others.

- The SFRPD shall place mirrors at blind corners along the trails such that different users can see who is approaching.

- If determined necessary, the SFRPD shall clear vegetation along trails that may have blind corners or sharp turns to provide a line of sight between different users.

G. DETERMINATION

On the basis of this initial study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

Paul E. Maltzer
Environmental Review Officer
for
Dean L. Macris
Director of Planning

DATE 12/9/06